FILE COPY

DEC 19
CHARLES ELMORE

Nos. 44 and 45.

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1930.

THE BEAUMONT, SOUR LAKE & WESTERN RAILWAY COMPANY ET AL., APPELLANTS,

VS.

THE UNITED STATES OF AMERICA ET AL., APPELLEES.

PETITION FOR REHEARING.

F. H. MOORE,
W. E. DAVIS,
E. T. MILLER,
M. G. ROBERTS,
J. R. BELL,
G. H. MUCKLEY,
H. H. LARIMORE,
C. S. BURG,
J. R. TURNEY,
ROBERT THOMPSON,
Counsel for Appellants.

SAMUEL W. MOORE,
Of Counsel.

December 16, 1930.

INDEX

Specification of Grounds for Petition for Rehearing. 2

I. The Court has inadvertently erred in holding that the evidence is sufficient to sustain the Commission's order. 4

(a) There was no evidence as to any carrier, concerning the amount of revenue required to pay its operating expenses, taxes and a fair return on its railway property, attributable to the traffic transported under the joint rates, the divisions of which are in issue here. Such evidence is specifically required by the provisons of Secton 15 (6) 4

(b) There was no evidence before the Commission showing the extent and classes of traffic, under the said joint rates, as to which each individual carrier was an originating, intermediate or delivering line. These facts were also required, under Section 15 (6) 17

II. The Court erred in linking together Section 15 (6) and Section 15a. In Section 15 (6) the term "Amount of revenue required to pay their operating expenses, taxes and a fair return on their railway property held for and used in the service of transportation" clearly refers to the amount of revenue required by the respondents to pay their respective operating expenses, taxes and a fair return attributable to the traffic moving under the joint rates in issue here. In Section 15a the similar provisions refer to the aggregate group values, rates and net income of the railroads, in a rate group, from all traffic and operations 19

III. The Commission failed to make essential findings of fact and its order should therefore be set aside since the Court cannot substitute its findings of fact for those of the Commission. 23

IV. The Commission made no findings and there was no evidence before it bridging the gap between its findings as to general conditions and average revenue required to pay operating expenses, taxes, and a fair return on investment in connection with handling all traffic in the two territories, and its formula for dividing the revenue from the particular traffic involved. 27

V. The Court has misapprehended the effect of various statements in the reports of the Commission. 39

1. The Court erred in stating that "The Commission found that existing divisions give Southwestern lines over 30 per cent more than a mileage prorate." What the Commission found was that the Southwestern lines under existing divisions, receive 12 to 13 per cent more than they would under a mileage prorate. 39

2. The statement that the amount of divisions, to-wit: $3,000,000, which is transferred by the Commission's order from the Southwestern carriers to the Western Trunk Line carriers, is "much less than one per cent of the total freight operating revenues of the Southwestern carriers" gives a wrong impression as to the effect of the Commission's order. 41

3. Statement that existing divisions are upon no logical or consistent basis . . . 45

4. The statement that "as to each carrier, operating and other conditions were shown and presumably considered by the Commission in deciding whether average or group conditions might appropriately be used" (p. 9) 46

5. The statement that "other things being equal, divisions made on the mileage basis will be the same as those made on the basis of relative costs" (p. 10 of opinion). 46

6. The statement that "The fact that average conditions affecting cost of transportation in the two groups have changed and are still growing more favorable to the Southwestern lines tends to justify a reduction of their existing divisions" (p. 10 of opinion). 47

7. The statement that "The average cost of service was apparently given much weight" (p. 9 of opinion). 49

VI. For the reasons above set forth, the Court should either reverse the decree of the district court or reverse and remand the case in order that the Commission may, in the light of the Court's decision, conduct further proceedings and make complete findings. 50

Certificate of Counsel. 52

Appendix A—Sections 15 (6), 15a (2) and 15a (6) of Interstate Commerce Act. 53

Appendices 1 to 5. 56

TABLE OF CASES AND STATUTES

Chicago Junction Case, 264 U. S. 258 9

Consolidation of Railroads, 63 I. C. C. 455, 616 .. 48

Federal Trade Commission vs. Curtis Publishing Co., 260 U. S. 568 25

Frank L. Smith et al. vs. Illinois Bell Telephone Co., No. 90, decided December 1, 1930 .... U. S. 9, 11, 51
Groesbeck vs. Duluth, South Shore & Atlantic Railway, 250 U. S. 607, 614 11
Interstate Commerce Commission vs. Clyde Steamship Co., 181 U. S. 29, 32 23
Interstate Commerce Commission vs. Chicago, Burlington & Quincy Railroad Co., 186 U. S. 320, 340 23
Interstate Commerce Commission vs. Louisville & Nashville Railroad Co., 190 U. S. 273, 284, 285 23
Louisville & Nashville R. R. Co. vs. Behlmer, 175 U. S. 648, 675, 676 23
Orient Division Case, 265 U. S. 272 9
Rowland vs. Boyle, 244 U. S. 106, 108 11
Sections 15 (6), 15a (2) and 15a (6), Interstate Commerce Act 53, 54, 55
St. Louis & O'Fallon R. R. Co. vs. United States, 279 U. S. 461 .....9, 22

Nos. 44 and 45.

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1930.

THE BEAUMONT, SOUR LAKE & WESTERN RAILWAY COMPANY ET AL.,
APPELLANTS,

VS.

THE UNITED STATES OF AMERICA ET AL.,
APPELLEES.

PETITION FOR REHEARING.

Come now the appellants and respectfully pray the Court to grant a rehearing in this cause.

We know that this Court grants rehearings very seldom, and properly so. It nevertheless seems to us so clear, upon a careful examination of the Court's decision, that it is based upon a misapprehension of the evidence, and that the Court, while reiterating the principles laid down in previous cases, which were contended for herein by us, has inadvertently approved a

decision of the Commission which is in direct conflict with those principles, that we believe we are justified in filing this petition.

Furthermore, it seems to us that since the Court found that the report of the Commission is insufficient to sustain its order, the presumptions in its favor no longer obtain, and the Court should, under the decisions, either reverse the decree of the District Court, with directions to set aside the Commission's order, or reverse and remand the case to the District Court for further proceedings, in order that the Interstate Commerce Commission may take additional testimony and make the necessary findings. It is our contention that one of those courses is likewise required by the lack of evidence on which to base the necessary findings.

Appellants therefore briefly state their grounds, supported by certificate of counsel, as follows:

1. The Court has inadvertently erred in holding that the evidence is sufficient to sustain the Commission's order, for the reasons among others that:

(a) There was no evidence as to any carrier concerning the amount of revenue required to pay its operating expenses, taxes and a fair return on its railway property, attributable to the traffic transported under the joint rates, the divisions of which are in issue here. Such evidence is specifically provided by the provisions of Section 15 (6).

(b) There was no evidence before the Commission showing the extent and classes of traffic under the

said joint rates as to which each individual carrier was an originating, intermediate or delivering line. These facts were also required under Section 15 (6).

2. The court erred in linking together Section 15 (6) and Section 15a. In Section 15 (6) the term "amount of revenue required to pay their operating expenses, taxes and a fair return on their railway property held for and used in the service of transportation" clearly refers to the amount of revenue required by the respondents to pay their respective operating expenses, taxes and a fair return attributable to the traffic moving under the joint rates in issue here. In Section 15a the similar provisions refer to the aggregate group value, rates and net income of the railroads in a rate group from all traffic and operations.

3. The Commission failed to make essential findings of fact and its order should therefore be set aside since the Court cannot substitute its findings of fact for those of the Commission.

4. The Commission made no findings and there was no evidence before it bridging the gap between its findings as to general conditions and average revenue required to pay operating expenses, taxes and a fair return on investment in connection with handling all traffic in the two territories, and its formula for dividing the revenue from the joint traffic involved.

5. The court misapprehended the effect of various statements in the reports of the Commission which are hereinafter more particularly specified and

discussed. For example, the court erroneously stated that "The Commission found that existing divisions give Southwestern lines over 30 per cent more than their mileage prorate," whereas the Commission actually found that the Southwestern lines receive much less, to-wit: 12 to 13 per cent more than a mileage prorate under the existing divisions.

6. For the reasons above stated the court should either reverse the decree of the District Court or reverse and remand the case in order that the Commission may, in the light of the Court's decision, conduct further proceedings and make complete findings.

We proceed to a discussion of the grounds specified above.

I.

The Court has inadvertently erred in holding that the evidence is sufficient to sustain the Commission's order.

(a) *There was no evidence as to any carrier, concerning the amount of revenue required to pay its operating expenses, taxes and a fair return on its railway property, attributable to the traffic transported under the joint rates, the divisions of which are in issue here. Such evidence is specifically required by the provisions of Section* 15 (6).

Copies of Sections 15 (6), 15a (2) and 15a (6) are printed in Appendix A.

In order to explain our proposition, it will probably be helpful to make come quotations from the Court's opinion, which we will abbreviate as much as possible.

The court re-affirms its previous rulings that the condition of each carrier, and the reasonableness of the division of each joint rate, must be considered.

The Court says (p. 5 of loose leaf printed copy of opinion):

> The Commission by Sec. 15 (6) is required to consider the condition of each carrier and to determine whether the division of each joint rate is unreasonable or otherwise repugnant to the specified standards and what division will for the future be just, reasonable and equitable. *United States* v. *Abilene & So. Ry. Co.*, 265 U. S. 274, 291. The Commission may not change an existing division unless it finds that division unjust or unreasonable.

The Court, with respect to our contention that the prescribed divisions will transfer substantial sums from very weak carriers in Southwestern territory to prosperous ones in western trunk line territory, and that a mere comparison of returns demonstrates that divisions on a group basis will be unjust and arbitrary, says (pp. 6-7 of opinion):

> It seems to us that the table included in the first report, and others received in evidence show as between individual carriers in each group so wide a range of rates of return that, if approximate similarity in that respect is essential to the order, its basis cannot be sustained.

The Court, after stating that the term "average," as used by the Commission, is not a mathematical average, but rather "an estimated general mean of the conditions of the several carriers constituting each

group arrived at by the exercise of judgment upon the facts shown by the evidence," continues:

> The reports satisfactorily show that the findings as to average group conditions taken as a whole are sustained by substantial and persuasive evidence. But they do not deal with the important question whether, under the evidence and having regard to the wide dissimilarities between rates of return earned by individual carriers in each territory, the use of the average or group basis is justified and whether it will produce unreasonable divisions. The general statements in the reports to the effect that the Commission in reaching its conclusions considered all the pertinent evidence add nothing to the *prima facie* persumption that generally attends determinations of the Commission. *Bluefield Co.* v. *Public Service Commission*, 262 U. S. 679, 688-689.
>
> The Commission's failure specifically to report the facts and give the reasons on which it concluded that under the circumstances the use of the average or group basis is justified leaves the parties in doubt as to a matter essential to the case and imposes unnecessary work upon the courts called upon to consider the validity of the order * * * A sound basis for the rule or formula prescribing the divisions is essential to compliance with the Act.

The Court holds, however, that this "matter essential to the case" is fully covered by the evidence. It says (pp. 9-10):

> With this criticism of the reports, we turn to what is shown by the record. A study of the facts that may be gleaned from the latter leads to the opinion that, notwithstanding the wide differences in rates of return between carriers the

basis adopted will not, at least on that account, result in unjust and unreasonable divisions. The Commission must consider the financial condition of the carriers but it is not required to make that the only test. And it did not take the average of the rates of return as the sole or principal factor for making the divisions. As to each carrier, operating and other conditions were shown and presumably considered by the Commission in deciding whether average or group conditions might appropriately be used. It is not shown that the order will require any service to be rendered at less than cost. It is impossible to make divisions that will yield the same rate of profit to each carrier or upon every commodity or shipment moved by it. The average cost of service was apparently given much weight. It is not suggested that the operating expenses of each carrier attributable to the traffic in question vary as does its rate of return on its business as a whole. Nor does it appear that the carriers having the highest rates of return from their total business or from that in the territory in which they belong, move the traffic in question at comparatively low costs. Returns from total business of a carrier and the cost of handling the traffic covered by the joint rates are not dependent upon the same facts; the relation between them is slight and remote. For aught that appears the carriers having little or no return on their total business may move the traffic in question at low costs and realize a satisfactory percentage of profit on that part of their business.

Other things being equal, divisions made on the mileage basis will be the same as those made on the basis of relative costs. The Commission found that existing divisions give southwestern lines over 30 per cent more than their mileage prorate and the order leaves them substantially

> more than would divisions on that basis. This indicates that the Commission considered the relatively high costs at which the southwestern lines, or some of them, moved the traffic in question. The fact that average conditions affecting cost of tranportation in the two groups have changed and are still growing more favorable to the southwestern lines tends to justify a reduction of their existing divisions. The greater density found in western trunk line territory makes for lower costs, and that is shown to have been taken into account.

But the matters which the Court, in defending the report of the Commission, implies that the appellants (defendants below) should have proved, are matters which the statute requires shall be affirmatively shown before the Commission, in order that the Commission may make a valid order in a proceeding to fix divisions.

The Court, in the last quotation, says:

> It is not shown that the order will require any service to be rendered at less than cost * * * It is not suggested that the operating expenses of each carrier attributable to the traffic in question vary as does its rate of return on its business as whole * * * Returns from total business of a carrier and the cost of handling the traffic covered by the joint rates are not dependent upon the same facts; the relation between them is slight and remote.

As already stated, the Court, in sustaining the Commission's order, overlooks the fact that proof of "the cost of handling the traffic covered by the

joint rates" was essential to the making of a valid order in this proceeding. One of the matters which must be proved under Section 15 (6) is the amount required by the various participating carriers to pay operating expenses, taxes and return on investment. The Court makes it clear by the above quotations, and it would appear to be self-evident, that what is required under Section 15 (6), is the "operating expenses of each carrier attributable to the traffic in question." In fact, the Court, in this decision, has virtually held that statistics as to cost of operation, net railway operating income etc., from all traffic and operations, do not constitute even *prima facie* evidence as to such cost of operation, rate of return, etc., attributable to a part of the traffic.

This is one of the matters which the act requires shall be proved, and shall be given due consideration.

We assert as solemnly as we can that there was no evidence whatever of the "operating expenses of each carrier attributable to the traffic in question." And there was no proof as to the rate of return of any carrier upon that portion of its property which is devoted to the traffic under the said joint rates.

These were matters which were necessary to be proved by competent evidence, otherwise the Commission's order cannot stand.

Chicago Junction Case, 264 U. S. 258.
Orient Division Case, 265 U. S. 272.
St. Louis & O'Fallon Railroad Co. v. *United States*, 279 U. S. 461.
Frank L. Smith, et al. v. *Illinois Bell Telephone Company*, No. 90, decided December 1, 1930.

The court has, by its decision, reversed the burden of proof. It denies the defendants relief because there is not in the record affirmative evidence which is necessary to sustain the Commission's order.

We give a summary of the evidence, in order to demonstrate that there was no evidence before the Commission concerning the operating expenses, net railway operating income, value of property devoted to such service, nor other such data, as to any respondent, attributable to the traffic transported under the joint rates in question.

It is true that there was a large amount of testimony detailing the general bases of divisions, and special divisions received in certain instances by certain carriers, but there is in that testimony no evidence in regard to cost of operation, net railway operating income, etc., with respect to the traffic under the said joint rates. That testimony simply deals with existing divisions.

There were elaborate statements of system earnings, value etc., for example, Exhibit A-50 (R. 250), A-51 (R. 258), A-52 (R. 262), A-53 (R. 264), A-54 (R. 266), A-55 (R. 274), A-78 to A-80 (R. 366), A-124 (R. 512) and A-241 (R. 922), but an examination will disclose that they all show revenue, expenses, ton miles and other statistics for all traffic and all operations of each railroad.

There remain, outside of the testimony concerning the efficiency with which the individual carriers are being operated, and some general statistics as to

traffic density, increase in population, industries, railroad mileage, etc., only what are referred to as the June and October, 1924 "tests." Statements were prepared (the June statement by the Western Trunk Lines and the October statement by the Southwestern lines) from what are known as the interline settlements, which are the statements upon which the carriers account for and divide among themselves the revenue from the traffic in which they participate. Such parts of these statements as covered the carload shipments moving under the joint rates in issue here, were drawn off, and put in the form of the statements which are referred to as the June and October tests.

There was no test in this case in the sense in which that term is used in such cases as *Rowland* v. *Boyle*, 244 U. S. 106, 108, *Groesbeck* v. *Duluth, South Shore & Atlantic Railway*, 250 U. S. 607, 614 and *Smith et al.* v. *Illinois Bell Telephone Company*, decided December 1, 1930. It is only by such a test that operating expenses, etc., attributable to a part of the traffic of a railroad can be proved unless the parties agree upon the facts.

We have reproduced, and attach at the end of this petition, typical pages from Exhibits A-41 to A-49 and A-116 to A-123, which cover the said tests of June and October. All of the exhibits which were introduced in evidence before the Commission were by order of the District Court transmitted to the clerk of the Supreme Court as original exhibits and they are of course available for examination if desired, but the

typical pages attached hereto will, in our opinion, give a complete and accurate idea of the data contained in those exhibits. The first page which we have reproduced (marked Appendix 1) is page 8 of Western Trunk Lines' Exhibit A-41. This and other similar exhibits show all of the carload shipments of freight, which were transported during the month of June, 1924, under the joint rates, as to which the Western Trunk Line respondents, which introduced them, were either the originating or delivering line (not all of the Western Trunk Line respondents prepared the information, and so the June, 1924, statement covers only a part of the traffic. The October, 1924, statement is practically complete). Exhibit A-41 was prepared by the Chicago & North Western Railway Company, one of the Western Trunk Line respondents, and shows all the traffic moving under the said joint rates as to which the Chicago & North Western Railway was the originating or delivering line. It will be noted, however, that the said exhibit does not give, with reference to any carrier which participated in the transportation, information as to the length of haul performed by such carrier, revenue received by such carrier, or other information as to any individual line. It simply gives the length of haul south of Kansas City and north of Kansas City, the division of revenue south and north of that gateway, and other information upon the same basis, with no subdivisions among the participating southwestern carriers south

of Kansas City, or Western Trunk Line carriers north of Kansas City. For example, the Kansas City Southern has its northern terminus at Kansas City but the Chicago & North Western does not reach Kansas City, and upon the first shipment shown on page 8, which was transported from Shreveport to Chicago, there is no showing as to the length of haul by any of the participating carriers except the Kansas City Southern. At least three carriers necessarily participated in the transportation, for the reason that the Chicago & North Western does not reach Kansas City and therefore could not have received the shipment directly from the Kansas City Southern. Take the fourth item, where the Gulf, Texas & Western was the terminal line. Neither the Gulf, Texas & Western nor the Chicago & North Western reach Kansas City, so that at least four carriers must have participated in the movement between Megargel, Texas and Highwood, Illinois.

We have also attached (Appendix 2) a summary sheet of the Western Trunk Line statement, Exhibit A-60, to show that the only information given is the gross revenue, lengths of haul, ton miles, etc., divided into two portions, that is, north and south of Kansas City. The information is shown in the same manner where the gateway is St. Louis, East St. Louis, Cairo, Gale or Thebes.

The information prepared by the Southwestern respondents with regard to carload shipments transported under the said joint rates during the month

of October, 1924, was presented in substantially the same form. We have reproduced as Appendix 3, sheet No. 1, of Exhibit A-116. This particular sheet shows shipments of freight moving via East St. Louis and Cairo. This sheet shows the commodity transported, number of cars, and number of tons of freight. It also shows the number of miles each shipment was transported south and north respectively of the gateway at East St. Louis or Cairo, and likewise number of tons one mile, gross revenue and average haul, all divided into two parts, that is, south and north of the gateway. No subdivisions of revenue, ton miles, etc., are shown, as between the individual Southwestern carriers or Western Trunk Line carriers, and as the Court can see by referring to the exhibit, the gross or net railway operating income, operating expenses, etc., of each carrier, are not shown and could not be ascertained, from the information contained in the said exhibit.

We have also reproduced as Appendix 4, another sheet of Exhibit A-116, which contains the divisional bases as well as information similar to that shown in Appendix 3.

We have also reproduced, as Appendix 5, Exhibit No. A-123, which is a summary of the detailed statements contained in Exhibits A-116-122, and which shows only the information above described.

There is no information as to the value of the property of the various carriers devoted to the service under the joint rates in question nor as to the

cost of such service. There is no such information either as to the individual carriers nor as to the two groups of carriers. This is plainly apparent from an examination of the said exhibits, and also from a consideration of the manner in which they were prepared. As already stated, the carriers took their records of settlements with their connecting lines, commonly known as interline settlements, and extracted therefrom all carload shipments transported under the joint rates during the months of June and October, 1924, showing the point of origin, point of destination, whether traffic was northbound or southbound, number of cars, tons, and revenue, and then computed, north and south of the gateway, the number of car miles, tons one mile, average haul, average revenue per ton per mile, and average revenue per car mile.

The Commission in its reports concedes that there were not only no figures showing the cost of service, return on investment etc., attributable to the interchange traffic, but that only system averages were available and used by it.

The Commission said (R. 85):

> The greatest obstacle in securing a satisfactory record has been the difficulty of determining relative costs of service so far as the traffic in question is concerned. It has apparently not been practicable to segregate this traffic in the two groups, nor indeed to separate group traffic wholly from operations beyond group boundaries.

The Commission in its report on reconsideration said (R. 105):

> Reverting to the criticisms in the petition, we were compelled to use system statistics because the carriers were unable to segregate the interchange traffic and show the respective costs of service for that alone, and no offer of such segregated cost is made in the present petition.

With reference to the last statement in the above quotation, we respectfully submit that the primary duty, in an investigation initiated by the Commission upon its own motion, was upon the Commission, to frame the issues and to see that proper evidence was introduced.

We think we may properly say that the appellants have not shown any inclination to shirk their obligations in this regard. The Western Trunk Lines presented a traffic statement for the month of June, 1924, which was incomplete for the reason that a number of the Western Trunk Lines prepared no statements. The Southwestern carriers then prepared a statement of traffic for the month of October, 1924, which was complete. The Southwestern carriers also presented very complete testimony upon the other subjects which had been covered by the Western Trunk Lines, and many of the figures furnished by the Southwestern carriers were used by the Examiner and by the Commission in their reports.

The appellants had called this defect in the evidence to the attention of the Commission, as is shown

by its comments thereon in its report on reconsideration (R. 103-105), and we called attention to it in our briefs in this Court. For example, at page 97 of our original brief we said:

> There was no *bona fide* attempt to determine the relative cost and relative constructive revenue on the particular joint traffic involved in the proceeding, although that was the "precise" question which the Commission had in mind. It is intimated by the Commission that this could not be determined, but it is well known that it might have been ascertained with a fair degree of accuracy by conducting a test, if by no other method (citing *Northern Pacific Ry. Co.* v. *Department of Public Works*, 268 U. S. 39).

(b) *There was no evidence before the Commission showing the extent and classes of traffic, under the said joint rates, as to which each individual carrier was an originating, intermediate or delivering line. These facts were also required, under Section* 15 (6).

The extent to which each carrier was an originating, intermediate or delivering line with respect to the traffic under the said joint rates was not shown in evidence. Probably this information could have been supplied by some additional labor in connection with the June and October traffic studies, but it was not done.

The Commission practically concedes that there was no such evidence, in its report on reconsideration (R. 101), where it states that it is required under Section 15 (6) to consider among other things "whether any particular participating carrier is an originating,

intermediate or delivering line," but the Commission says: "these plainly are matters affecting cost of service." Since the only evidence which the Commission had, however, with regard to cost of service, was the cost of operation etc., on account of all operations and all traffic of each railroad, it is evident that such cost of service would not indicate to what extent a carrier was an originating, intermediate or delivering line as to that particular traffic, nor its effect on cost of service with respect to that traffic. It does not appear to us, however, that figures as to cost of service, even though segregated to the interchange traffic, could supply what was intended by the above requirement. If so, Section 15 (6) would not have specifically required this information in addition to evidence of cost of service.

The full quotation from the Commission's report on reconsideration on this subject is as follows (R. 101):

> The southwestern lines contend that relative cost of service in the two groups is not the only thing to be considered in fixing divisions, nor even a "vital factor," and that the act specifies many other things which must be considered.
>
> Comment—Relative cost of service is clearly a vital factor. Section 15 (6) of the Interstate Commerce Act specifies as matters to be considered the "amount of revenues required to pay their respective operating expenses, taxes, and a fair return on their railway property held for and used in the service of transportation" and "whether any particular participating carrier is an origi-

nating, intermediate, or delivering line," and these plainly are matters affecting cost of service. There are other matters to be considered, such as the "efficiency with which the carriers concerned are operated" and the "importance to the public of the transportation service of such carriers," but all of these we took into consideration after summarizing the pertinent evidence.

II.

The court erred in linking together Section 15 (6) and Section 15 a. In Section 15 (6) the term "Amount of revenue required to pay their operating expenses, taxes and a fair return on their railway property held for and used in the service of transportation" clearly refers to the amount of revenue required by the respondents to pay their respective operating expenses, taxes and a fair return attributable to the traffic moving under the joint rates in issue here. In Section 15 a the similar provisions refer to the aggregate group values, rates and net income of the railroads, in a rate group, from all traffic and operations.

The order of the Commission is based entirely on statistics as to cost of operation, rate of return, etc., from all traffic and all operations of the respondents, whether within or outside of the Southwestern territory and Western Trunk Line territory. This is necessarily true for the reason that as we showed under proposition I of this brief, no evidence was introduced and there has been no ascertainment of the cost of operation, rate of return, etc., of the various respondents, attributable to the traffic moving under the joint rates in issue here.

The Commission has not been given the power to transfer revenue from one group of carriers to another group of carriers upon a finding that one group, from all operations and traffic, is in better average condition than another group, regardless of the sources from which its net revenue is obtained.

The only power, in a proceeding under Section 15 (6), which has been given to the Commission, is to fix just and reasonable divisions of revenue from the joint rates of the participating carriers.

For this purpose, it is necessary to have evidence of the cost of operation, rate of return, etc., attributable to the traffic, the divisions of the joint rates of which are to be fixed; and evidence of average cost of operation, average rate of return, etc., from all operations and all traffic of the various respondents, is, as the court has held in this case, not competent evidence of such facts with reference to the traffic under the particular joint rates.

The Commission has confused its functions under Section 15 (6) and Section 15 a, and the Court has in like manner, erred in sustaining that action of the Commission. The Commission's function under Section 15 a, is to establish rates which as nearly as may be, will yield a fair return upon the aggregate value of the railway property held for and used in the service of transportation of the carriers in the rate group. For that purpose, the competent and material evidence is the aggregate investment of all the carriers in the

group, and the average rate of return received by all those carriers from all operations and traffic within the rate group.

Under Section 15 (6) however, the competent and material evidence is the amount of operating expenses, taxes and net income, required by each carrier, or type of carriers, from the divisions of the particular rates which are in controversy. The fact that a group of carriers is, on the average, earning a higher rate of return, than another group of carriers, from all operations and traffic of such carriers, does not give the Commission power to transfer a portion of the revenue of one such group to the other group under the guise of fixing reasonable divisions of the joint rates participated in by those two groups of carriers. But that is what the Commission has done in this case.

If, however, we are mistaken, and it is permissible, under Section 15 (6) of the Act, to transfer revenue from one group of carriers to another, on account of a finding that financial and transportation conditions generally are better in one group than in the other, judged by net revenues etc. from all traffic and operations, it would seem to follow necessarily that such a transfer cannot be made unless the group from which the revenue is taken is earning a reasonable return. In fact, it would seem that the group ought to be earning more than a reasonable return, so that the operation would in effect be a partial recovery of excess earnings, such as is provided for in Section 15a (6) of the Act. Neither the Western Group, which is the rate group, designated by the Commission, as provided in Section 15a, in which

all of the respondents are located, nor the Southwestern group, nor the Western Trunk Line group, as designated by the Commission in this case, is earning a reasonable return on investment, nor substantially the 5¾ per cent which it is the mandatory duty of the Commission to provide, as nearly as may be. (As to return of Western Group see Note 29, *St. Louis O'Fallon R. Co.* v. *United States,* 279 U. S. 461, 508; and as to return of Southwestern and Western Trunk Line groups, see table, R. 84.) The Court states in its opinion (p. 5) that the facts specified in Section 15 (6), and others necessarily or properly to be taken into account, are to be considered, having regard to the duty of the Commission under Section 15a (2). We respectfully submit, however, that Section 15a (2) does not appear to have been given any effect in this case. Especially in view of the difference in rate levels in the Southwestern territory and Western Trunk Line territory, the general level of all rates being about 25 per cent higher in the Southwestern territory, it should be held that the Commission must comply with its duty under Section 15a (2) to establish rates which will yield substantially 5¾ per cent upon the aggregate investment in the groups, before making such a group order, as was made in this case, for the change of divisions. It cannot reasonably be contended that the Commission has complied with its duty under Section 15a (2) for the reason that the rates established by it fall so far below a return of 5¾ per cent.

III.

The Commission failed to make essential findings of fact and its order should therefore be set aside since the Court cannot substitute its findings of fact for those of the Commission.

This Court found that the Commission failed to make essential findings of fact. The Commission's order is therefore void upon its face. It has been repeatedly held that where necessary findings of fact are not made by the Commission, its order cannot be sustained by the courts. *Louisville & Nashville Railroad Co.* v. *Behlmer*, 175 U. S. 648, 675, 676; *Interstate Commerce Commission* v. *Clyde Steamship Co.*, 181 U. S. 29, 32; *Interstate Commerce Commission* v. *Chicago, Burlington & Quincy R. R. Co.*, 186 U. S. 320, 340; *Interstate Commerce Commission* v. *Louisville & Nashville Railroad Co.*, 190 U. S. 273, 284, 285.

In the present case, the Court went to the record for the purpose of supplying the deficiencies in the Commission's findings of fact. The Court said (pp. 7-8):

> The reports satisfactorily show that the findings as to average group conditions taken as a whole are sustained by substantial and persuasive evidence. But they do not deal with the important question whether under the evidence and having regard to the wide dissimilarities between rates of return earned by individual carriers in each territory, the use of the average or group basis is justified and whether it will produce unreasonable divisions. • • • The Commission's failure specifically to report the facts and give the reasons on which it concluded that under the circumstances the use of the average or group

> basis is justified leaves the parties in doubt as to a matter essential to the case and imposes unnecessary work upon the courts called upon to consider the validity of the order.

The Court then said (p. 9):

> With this criticism of the reports, we turn to what is shown by the record.

It appears that the Court turned to the record for the purpose of determining whether or not there was sufficient evidence to support the findings of fact which the Commission might have made but did not. The Court, apparently being of the opinion that there was sufficient evidence to support the essential findings which the Commission failed to make, affirmed the order without either making the necessary findings itself or remanding the case to the Commission to make findings with reference to the matters omitted. The effect of this was to affirm the Commission's order *although no body authorized by law, has ever made the findings essential to support the order.* We have shown that the courts are without authority to supply findings omitted by the Commission. It necessarily follows that the present order is void and should be set aside or remanded to the Commission for the taking of further evidence and making additional findings. As we have said, inasmuch as the Commission's reports and orders are insufficient on their face, there can be no presumption in their favor. There is no presumption that the Commission would have made the essential findings of fact which have been omitted. No one can say what findings of fact the Commission

would have made with reference to the features not dealt with in its report. In fact, the omission of the essential findings clearly indicates, if it does not raise a presumption, that the Commission was of the opinion that the evidence did not justify it in making such findings.

In any event, the action of the Court in respect to these absent findings necessarily involves the making of findings upon first impression. It has been repeatedly held in the cases above cited that the courts have no authority to make findings upon first impression, in reviewing a decision of the Interstate Commerce Commission. This is supported by what this court said in *Federal Trade Commission* v. *Curtis Publishing Co.*, 260 U. S. 568, where an order of the Federal Trade Commission which omitted certain essential findings of fact was reviewed by this Court. The statute authorizing review of decisions of that body not only provides that the court may set aside the Commission's order, but also provides that the court may enter a decree modifying the Commission's order. In the case above cited, this Court set out a possible distinction between its power of review of the decisions of the Federal Trade Commission and of the Interstate Commerce Commission indicating clearly that in a review of the Interstate Commerce Commission's decisions, it will not make additional findings. At p. 580 the Court said:

> Manifestly, the court must inquire whether the Commission's findings of fact are supported by evidence. If so supported, they are conclusive. But as the statute grants jurisdiction to make and

> enter, upon the pleadings, testimony and proceedings, a decree affirming, modifying or setting aside an order, the court must also have power to examine the whole record and ascertain for itself the issues presented and whether there are material facts not reported by the Commission. If there be substantial evidence relating to such facts from which different conclusions reasonably may be drawn, the matter may be and ordinarily, we think, should be remanded to the Commission—the primary fact-finding body—with direction to make additional findings, but if from all the circumstances it clearly appears, that in the interest of justice the controversy should be decided without further delay, the court has full power under the statute so to do. The language of the statute is broad and confers power of review not found in the Interstate Commerce Act (24 Stat. 379). *Louisville & Nashville Railroad Co.* v. *Behlmer*, 175 U. S. 648, 675, 676, 20 Sup. Ct. 209, 44 L. Ed. 309, *Interstate Commerce Commission* v. *Clyde Steamship Co.*, 181 U. S. 29, 32, 21 Sup. Ct. 512, 45 L. Ed. 729, and *Interstate Commerce Commission* v. *Chicago, Burlington & Quincy Railroad Co.*, 186 U. S. 320, 340, 22 Sup. Ct. 824, 46 L. Ed. 1182, while helpful as to proper practice, do not determine the present problem.

The Court found in effect that the evidence was not sufficient to support all of the necessary findings of fact which it was essential for the Federal Trade Commission to make so as to support the order which it had entered, and the Court thereupon affirmed the decree of the lower court setting aside the Commission's order.

There seems to be some doubt, however, as to the authority of the court to make additional findings even under the statute involved in that case, if those findings would result in supporting the order. In a

separate opinion in that case, Mr. Chief Justice Taft with whom Mr. Justice Brandeis concurred said (p. 583):

> If this means that, where it clearly appears that there is no substantial evidence to support additional findings necessary to justify the order of the Commission complained of, the court need not remand the case for further findings, I concur in it. It is because it may bear the construction that the court has discretion to sum up the evidence pro and con on issues undecided by the Commission, and make itself the fact-finding body, that I venture with deference to question its wisdom and correctness.

It is respectfully submitted that the Court was in error in assuming that findings of fact, sufficient to sustain the order herein, could and would have been made by the Commission since, under many prior decisions of this Court, the Interstate Commerce Commission is the only body which can make affirmative findings of fact with respect to the issues involved in the proceedings before it.

The course followed by the Court is highly prejudicial to appellants because they have no opportunity to examine such missing findings to determine whether they are supported by the facts and the law.

IV.

The Commission made no findings and there was no evidence before it bridging the gap between its findings as to general conditions and average revenue required to pay operating expenses, taxes and a fair return on investment in connection with handling all traffic in the two territories, and its formula for dividing the revenue from the particular traffic involved.

This matter was presented in our briefs but was not discussed by the Court, being apparently considered

as not meriting separate discussion. We earnestly urge that it goes to one of the most essential features of the Commission's decision.

The Court holds (p. 9 of opinion):

> A sound basis for the rule or formula prescribing the divisions is essential to compliance with the Act.

The formula prescribed by the Commission is not supported by certain findings of fact which are essential to its validity, nor is there sufficient evidence in the record to support such required findings. All of the evidence discussed by the Commission in its report and every finding which it made was with reference to the average relative conditions or cost of handling *all traffic* plus taxes, like charges, and return on investment, on the railroads in the two groups. From these findings as to general costs and conditions, the Commission arrived at the conclusion that railroads in the Southwestern group require an average revenue per ton mile 17 to 20 per cent greater than do the Western Trunk Lines, to pay operating expenses, taxes and other like charges, and a fair return on investment.

The Commission made no findings of fact whatsoever which would bridge the gap: (a) Between these general findings, and the application of varying divisional bases in different portions of Western Trunk Line territory, (b) between these general findings and their application in connection with the movement of the particular traffic involved, nor (c) between these

general findings and the individual movements in the two territories under the joint rates, and the application of the formula to the individual movements under the joint rates

Perhaps a more detailed analysis of what steps the Commission took, and those omitted, in arriving at the formula or method for dividing the individual rates, will disclose more clearly the complete hiatus between the findings made and the formula adopted.

The Commission first proceeded to compare the two territories or regions as to increase in population and railroad mileage. It concluded, however, by saying that population was an unsatisfactory basis of comparison.

It next proceeded to discuss such matters as value of farm products in the two regions and the percentage of increase that had occurred in such production in each of those regions; the value of products of industries and the increase thereof; the higher level of rates in the Southwest; the length of the average hauls in the two regions and the difference in traffic density in the two regions, and in the various states incorporated in those regions. However, it drew no definite conclusion or basis of comparison from any of these matters. The Commission then stated (R. 78):

> The vital thing to ascertain here is obviously the relative cost of service in the two groups.

The Commission then discussed the relative cost of service as derived from the average freight operating expenses per ton mile of all traffic of Class I carriers operating within the two groups, and conclud-

ed that it cost somewhere in the neighborhood of 15 per cent more per ton mile on the average to haul freight in the Southwest than in Western Trunk Line territory, but it said that operating expenses do not include overhead charges and that (R. 79):

> A still better basis for comparison would obviously be the amount needed in each case to cover operating expenses, taxes and other like charges and a fair return on investment.

The Commission next computed the average revenue per ton per mile which would be required to yield the amount needed by the Class I carriers in each group to cover operating expenses, taxes and other like charges, and a fair return on investment in the movement of all freight traffic. It found (R. 82) that this would have required during the year 1923, a revenue of 12.08 mills per ton mile for the Western Trunk Lines and 14.67 mills for the Southwestern lines (if the Santa Fe and Rock Island were included in the statistics for both groups). The Commission concluded from these statistics that the cost of service including a fair return on investment was somewhere in the neighborhood of 17 to 20 per cent greater, per unit of service, in the Southwest than in the Western Trunk Line group, based on the averages of 1923 and 1924 operations in connection with *all freight traffic* (R. 83). The Commission said with reference to these figures (R. 83):

> These figures are, of course, open to the criticism that they are either based upon the operations of systems which extend in some instances beyond group boundaries or, in the case

> of the strictly group lines, upon an incomplete showing of group operations. However, there are reasons to believe that they are not unfair to defendants.

The Commission then made a summary of the evidence "so far as salient facts are concerned" (R. 85-6). In this summary it stated that the cost of operation per ton mile including all expenses, charges and a fair return on investment, in all probability does not average as much as 20 per cent higher in the Southwest than in the Western Trunk Line group (R. 86). Referring to the other findings, we find that they relate to the cost and other charges including return on investment on all traffic in the two groups. The court has laid stress upon the Commission's statements that the average conditions effecting cost of transportation in the two groups have changed, and are still growing more favorable to the Southwestern lines. The increases in population, industrial development and other changes in conditions are of no materiality unless they increase the traffic and the revenue of the carriers, therefore, such changes or improvements in so far as material to the proceeding before the Commission, were expressed and measured by the finding that the cost of service including taxes and like charges and a fair return on investment on all traffic was somewhere in the neighborhood of 20 per cent greater in the Southwest than in the Western Trunk Line group.

Here the Commission's findings of fact end. It made no further computations or findings which might constitute a basis for reducing the needed revenue

of the Southwestern respondents below the said revenue of 17 to 20 per cent greater per ton mile than that received by the Western Trunk Lines, nor for determining whether or not this relationship of the needed or "constructive" revenue per ton mile attributable to the particular traffic moving under the joint rates involved, was the same.

After having made these general findings, the Commission said that a proper readjustment would be accomplished by dividing the joint rates south and north of the gateways in proportion to assumed rates for the two hauls. The assumed rate for the distance covered by the haul south of the gateway was to be the first class rate for that distance under the present Southwestern scale (prescribed by the Commission in *Consolidated Southwestern Cases,* 123 I. C. C. 203, decided subsequent to the closing of the hearings in the Divisions case), and the assumed rate for the distance covered by the haul north of the gateway was to be 80 per cent of that first class rate in the case of traffic to or from points in Illinois and Wisconsin (in the second report, this percentage was changed to 75 per cent where the traffic moved through St. Louis), and 87 per cent of said first class rate for the distance hauled in Western Trunk Line territory in case of traffic to or from other points in Western Trunk Line group. In the case of traffic to or from points in official territory east of the Indiana-Illinois state line, the assumed rate used was to be 80 per cent of the said first class rate, minus 10c (changed to 15c in the

second report) because of the absence of originating or delivering service (R. 86-7).

It is evident from what is said by the Commission thereafter that these distinctions as to the different bases to be applied in connection with traffic moving to or from different portions of the Western Trunk Line region, were the result of the Commission's conclusion that the operating costs plus taxes and like charges and return on investment were less per ton mile in Illinois and Wisconsin than in the other portions of the Western Trunk Line region. But there are no findings by the Commission with reference to this feature and there is no evidence in the record before the Commission upon which either the Commission or this Court could enter a finding that the so-called constructive revenue needed in Illinois and Wisconsin is 80 (or 75) per cent of the constructive revenue needed within the entire Southwest; nor that the constructive revenue needed within the rest of the Western Trunk Line territory was 87 per cent of the constructive revenue needed in the entire Southwest; nor, what is more pertinent to the essential findings which the Commission would be required to make in this regard, were there any findings by the Commission, or any evidence upon which either the Commission or this Court could have found, the cost and other charges attributable (1) to traffic moving under the joint rates to or from Illinois and Wisconsin, nor (2) to the traffic moving to or from the remainder of Western Trunk Line territory. It is clear that such findings would be

necessary in order to bridge the gap between the finding as to the general conditions, and the constructive revenue needed in connection with the handling of all traffic in the two groups, on the one hand, and the specific conditions and the constructive revenue required in connection with the traffic under the joint rates, on the other hand. As stated, there were no such findings and there was no evidence upon which either the Commission or the Court could make such findings, since no evidence whatsoever was introduced with relation to the cost attributable to the handling of the particular traffic involved.

The Commission said in its original report (R. 88):

> It should be borne in mind that under the 80 per cent basis the assumed rates used south of the gateways are 25 per cent greater relatively than those used north thereof, and that under the 87 per cent basis they are 15 per cent greater.

and in its report on reconsideration the Commission made a further attempt to explain the use and propriety of the varying bases for divisions in the Western Trunk Line territory in the following manner (R. 104):

> From these figures we drew the general conclusion, which is not criticized, that the cost of service in the Southwest was somewhere in the neighborhood of 20 per cent greater, based on averages of 1923 and 1924 operations, and somewhere in the neighborhood of 17 per cent greater, based on 1924 operations. The actual figure which we used in arriving at our divisional basis was about 22.5 per cent, for we used 25 per cent excess for the Southwest on the traffic to and from Illinois and Wisconsin points and 15 per cent for

> the remainder of the traffic to and from western trunk line points, and the former appeared to be about three times the latter in volume.

It is possible that the Commission might have attained the result indicated, that is, have accorded to the Southwestern respondents divisions on the whole which would have yielded them 122.5 per cent more per ton mile under the joint rates involved than was yielded to the Western Trunk Lines under the prescribed divisions, if the Commission had based its formula upon a so-called constructive mileage prorate, that is, for example, by according to the Southwestern respondents divisions based upon factors arrived at by using 125 per cent of the distance hauled in Southwestern territory, and to the Western Trunk Lines, factors based upon 100 per cent of the distance hauled in Western Trunk Line territory, when the traffic moved to or from Illinois or Wisconsin.

But the Commission did not do this. It applied the various percentages, that is, the 100 per cent for Southwestern territory, and the 75, 80 or 87 per cent for the various portions of Western Trunk Line territory, to the first class Southwestern scale, in order to determine the factors of the participating carriers for dividing the joint rates applicable upon specific movements. Where the hauls in the two territories are of the same length, the results which the Commission has indicated, in the above quotations, should be accomplished, would in fact be brought about as to those individual movements; but where the length of the haul in one territory is greater than the length

of the haul in the other territory, the use of the Southwestern scale in the formula results in according to the Southwestern respondents widely varying percentages of the ton mile earnings accorded to the Western Trunk Lines. This is by reason of the fact that the average rate per 100 pounds, and the average revenue per ton mile, under the said Southwestern scale, decreases rapidly with increase in distance, as explained at page 33 of appellants' reply brief.

At pages 34 to 39, inclusive of appellant's reply brief, we have shown several specific examples of the effect of the use of the Southwestern rate scale in the formula or basis for the prescribed divisions, and for the sake of brevity we do not repeat those examples here.

Although the Commission made findings as to average conditions, it concluded by prescribing a formula to be applied in connection with the handling of the individual shipments moving under the joint rates involved which does not relate to averages or average conditions but which varies depending upon the length of haul on the individual shipments in the two territories. There is no explanation or finding of fact made by the Commission with reference to the adoption of this formula, except the statement in its report on reconsideration that this formula was merely a method or mechanism for arriving at divisions of the joint rates in conformity with the basis which the Commission had already found to be proper (R. 96-97). But the Commission makes no findings of fact bridging

the gap between this formula for dividing the specific rates and the other findings relating to average or group conditions.

It is possible, however, to glean from the Commission's report and the brief filed on its behalf the reasons for the use of the Southwestern scale and its formula, but not the facts which support its use, since there was no evidence in the record which would support any findings of fact justifying its use.

The Commission said (R. 64):

> a mileage prorate is by no means a perfect method of dividing joint rates * * * It results in the same ton mile revenue for each participating carrier, regardless of the length of haul and of the principle that, other things being equal, ton mile yields should decrease as distance increases. *New England Divisions*, 126 I. C. C. 579, 667. It is for this reason that rate prorates or block-mileage plans are often used in preference or that provision is made for minimum divisions of not less than 25 per cent, or some similar percentage.

The matter is further explained at pages 29-30 of the brief on behalf of the Commission, as follows:

> "Cost of service" is by no means the equivalent of "revenue per ton per mile." It is a universal rule that revenue per ton per mile, even upon a single commodity over the same railroad, varies with the length of haul, and for very good reasons. Cost of service is made up of two elements. Cost of terminal operations is one element, and it is constant, regardless of the length of haul. The other element is the cost of the line haul, which varies with distance. The combination of these two elements, one constant

> and the other variable, of course produces a total cost per ton per mile, which likewise varies with distance, but not in direct ratio.

However, the Commission made no findings of fact to the effect that the cost of handling the traffic involved or the constructive revenue needed by the two groups of carriers upon the traffic involved, varied with the length of haul; nor that the costs of or the constructive revenue needed in connection with the individual shipments moving under the joint rates varied with the length of the haul. Nor did the Commission find that if they did vary with the length of haul, they varied as the rate per mile or rate per ton mile under the first class Southwestern scale varies. Evidently, without very detailed evidence as to cost of operation, length of haul and other particulars with reference to the traffic under these joint rates, such a formula could not be worked out, and it is doubtful whether, even with such detailed information, it would be possible. It thus appears that the Commission failed to make essential findings of fact with reference to the use of the Southwestern scale in its formula for dividing the joint rates. Furthermore, there is no evidence in the record which would have supported those essential findings if they had been made. It is apparent that no "sound basis for the rule or formula prescribing the divisions" appears either from the Commission's findings of fact or from the evidence introduced before the Commission.

V.

The Court has misapprehended the effect of various statements in the reports of the Commission.

We consider the matters discussed under this heading as very important, since apparently the Court, in the statements hereinafter referred to, set forth some of the main considerations upon which it relied, as showing that it could safely be presumed that the Commission's order was fair and just.

1. *The Court erred in stating that* (p. 10) *"The Commission found that existing divisions give Southwestern lines over 30 per cent more than a mileage prorate." What the Commission found was that the Southwestern lines under existing divisions, receive 12 to 13 per cent more than they would under a mileage prorate."*

The Commission's finding is as follows (R. 63):

> These tables * * * show that defendants are receiving, on the average from all of the traffic, divisions which exceed what they would obtain under a mileage prorate by from 12 to 13 per cent. This showing, however, must be considered in connection with the fact that complainants received divisions on the same traffic which were less than they would have received under a mileage prorate by from 13 to 16 per cent.

The evidence showed conclusively that it is necessary for the Southwestern carriers to receive substantially more than a mileage prorate in order to secure the same return upon investment as is received by the Western Trunk Lines.

The entire level of rates, in the Southwestern territory, is on a higher level than the level of rates

in Western Trunk Line territory, and as stated, the Southwestern carriers must receive this higher level of rates in order to approximate the same return as is received by the Western Trunk Lines. This is apparent from an examination of the table in the report (R. 84) which shows that during the years from 1916 to 1925, inclusive, such higher level of rates gave the Southwestern lines only 4.30 per cent return on investment as compared with a return of 3.98 per cent received by the Western Trunk Lines. The level of rates in the Southwestern region is 25 per cent higher than in the Western Trunk Line territory. On this subject, the Commission found (R. 72):

> The general level of rates was somewhere in the neighborhood of 25 per cent higher in the Southwest than in Western Trunk Line territory.

The average cost of operation was also much higher in the Southwest than in Western Trunk Line territory. The Commission found on this subject that (R. 78):

> It cost somewhere in the neighborhood of 15 per cent more per ton mile to haul freight in the Southwest than in Western Trunk Line terrtory.

The Commission also found that in order that the Southwestern carriers might earn a fair return upon investment, they must receive 17 to 20 per cent more revenue per unit of service than did the Western Trunk Lines. The Commission on this subject found that (R. 83):

> The cost of service including a fair return on investment was somewhere in the neighborhood

> of 20 per cent greater in the Southwest than in the Western Trunk Line group, based on averages of 1923 and 1924 operations, and somewhere in the neighborhood of 17 per cent greater based on 1924 operations.

These figures established conclusively that it was necessary that the Southwestern lines should receive very substantially more than a mileage prorate in order to receive their just divisions from these joint rates. An excess of 12 to 13 per cent of a mileage prorate would not appear to be more than was necessary, judging by the figures as to the differences of level of rates in the two territories, and the relative average cost of operation and relative amount of revenue required to pay a fair return on investment. If the level of rates in the Western Trunk Line region is not high enough, as all the testimony of record indicates that it is not, the proper remedy was, not to take revenue from these Southwestern carriers which were receiving much less than a fair return, but to increase the rates of the Western Trunk Lines to a proper level.

2. *The statement that the amount of divisions, to-wit*: $3,000.00, *which is transferred by the Commission's order from the Southwestern carriers to the Western Trunk Line carriers, is "much less than one per cent of the total freight operating revenues of the Southwestern carriers" gives a wrong impression as to the effect of the Commission's order.*

The said sum of $3,000,000 is about ½ of 1% of the gross freight operating revenues of the Class I carriers in Southwestern territory including all freight revenues of the Santa Fe and Rock Island (R. 82) and about 2% of such net railway operating income (R. 80).

The Court, on p. 4 of its opinion, quotes the above statement from a similar statement made by the Commission in its report on reconsideration. We submit, however, that the above statement does not correctly measure the effect of the Commission's order in this divisions case. The Commission did not have the right to consider the entire revenues, of these two groups of carriers, from all operations, and to transfer a part of the entire gross revenues of certain Southwestern carriers to certain Western Trunk Line carriers. As already stated under another heading, the Commission's power is limited, in such a proceeding, to fixing just divisions of the revenue from the joint rates participated in by the Southwestern and Western Trunk line respondents. Consequently, the measure of the effect of the Commission's order is the amount of the Southwestern lines' income, from the said joint rates, which is taken. We turn to the statement (Petitioners' Ex. 10, R. 1226) of revenue of the Southwestern respondents from these joint rates during September, 1928. That exhibit shows that the revenue of the respondent Southwestern lines, from the joint traffic, was $3,320,756 for that month, or $39,849,072 per year. The sum of $3,000,000 is 7½ per cent of that amount.

The percentage of gross revenue taken, is however, not the correct measure of the effect of the Commission's order, since the said sum of $3,000,000 will be deducted from net railway operating income, inasmuch as all the service under the joint rates must still continue to be performed, and there will be no

saving through reduction of expenses. The only figures in the record, as to the relation of net railway operating income to gross income, is the average ratio from all operations and traffic, passenger and freight. This measure is, of course, not the accurate measure of the cost of operation, etc., with reference to this joint traffic. Taking this ratio for what it may be worth, however, we find that the ratio (shown on p. 2 of Western Trunk Lines' Ex. A-241, R. 922), "of the sum of railway operating expenses, railway tax accruals, uncollectible railway revenues, and equipment and joint facility rents to the railway operating revenue" from all traffic and operations of the Southwestern carriers, was, during the year 1925, 81.57 per cent. That percentage of the gross revenue of $39,849,072 is $32,504,888. Deducting the latter sum from the said gross revenue, there remains as the net railway operating income from the said traffic, the sum of $7,344,184, and the said sum of $3,000,000 is 40.8 per cent of the said sum of $7,344,184. If the cost of operation, taxes and other charges attributable to the traffic in question were only two-thirds of the average of such costs upon all traffic, there would still be taken more than 20 per cent of the net railway operating income of the Southwestern carriers, from the said joint traffic.

The above figures should convince the Court that the order in question does not affect the revenues of appellants "only incidentally," as was stated by the District Court (R. 1331).

In fact, as clearly appears from the record, the ultimate effect upon the revenues, of this divisional

proceeding, was all that the Western Trunk Lines were interested in.

Mr. Towner, attorney for the Western Trunk Lines, at the argument before the Commission (R. 1254), said:

> The Examiner finds * * * "No such convincing showing has been made as would justify affirmative action on the part of this Commission with respect to the divisions in the aggregate, but there is much reason to believe that a constructive revision of individual divisions by the carriers interested would be warranted."
>
> That, doubtless, would be a desirable thing to do, but as far as I am concerned, and my concern is to get more money for the railroads that I represent, that is purely academic. If the good and bad divisions balances that, there should be no change; that is a matter for the traffic men to take care of. They can fix that up themselves. What I am interested in is to get such a change in the divisions as will transfer from the Southern (Southwestern) to the Western Lines some of the money that the Southwestern is getting under the present division.

The above statement is confirmed by what the Commission said in its report. It said (R. 58-59):

> Complainants and defendants alike admit that the divisions in question conform to no systematic and consistent plan, but they are not particularly interested in the revision of individual divisions. What complainants seek and defendants oppose is primarily a finding that the former are entitled to substantially increased revenue in the aggregate out of the traffic under consideration, and a fixation of divisions appropriate to that end.

We again repeat, however that the plan adopted by the Commission operated to take revenue on account of all operations of respondents, under the guise of fixing divisions of joint rates covering a part of the traffic.

3. *Statement that existing divisions are upon no logical or consistent basis.*

The Court (p. 2 of opinion) quotes from the Commission's "salient facts" the statement that

> Existing divisions were established for the most part about 35 years ago and conform to no logical or consistent basis.

If the establishment of the divisions upon a logical and consistent basis constituted a legal reason for abrograting the divisions, it would appear naturally to follow that the new basis of divisions, in order to be logical and consistent must apply to all of the joint traffic between the Southwestern and Western Trunk Line territories, or that some good reason should be given for the omission of a substantial part of the traffic.

As we showed, however, the divisions prescribed by the Commission will apply to only 2/3 of the traffic under the said joint rates; the existing divisions will remain in force as to the balance. Consequently, the Commission's order, instead of producing a more "logical and consistent basis," will produce the opposite. As this Court said (p. 2 of opinion) the District Court found "that as the prescribed divisions did not apply to all joint rates between the two territories, confusion and large useless expenditures would

result." The confusion will necessarily continue, since there will continue to be two bases of divisions.

4. *The statement that "as to each carrier, operating and other conditions were shown and presumably considered by the Commission in deciding whether average or group conditions might appropriately be used"* (p. 9).

As we have already urged, we are entitled to know, through proper findings, what those operating and other conditions were. No findings could be drawn, in our judgment, which would reasonably sustain the Commission's order, for the reason that there is no evidence on which to base such findings.

5. *The statement that "other things being equal, divisions made on the mileage basis will be the same as those made on the basis of relative costs"* (p. 10 of opinion).

We are not sure that we understand the above statement, but obviously it would only be true if the relative costs were the same as to all carriers participating in transportation under the joint rates, or the "mileage basis" was a "constructive" mileage prorate adjusted in accordance with the variation in costs in the two territories. The statement, however, condemns the order of the Commission here under consideration. The Commission found that, based upon all operations in the two territories, the average cost of service per ton mile was 15 per cent greater in the Southwestern than in Western Trunk Line territory (R. 78); and, based upon average cost of operation per ton mile, including all expenses, charges and a fair return on investment, averages from 17 to 20 per cent

more in Southwestern territory (R. 83). It was shown by the application of the prescribed formula to the joint traffic moving during September, 1928, that the Commission's order accorded the appellants only 9 per cent more per ton mile than the Western Trunk Lines (Ex. 11, R. 1227), whereas under a "constructive" mileage prorate related to the costs as developed in the Commission's findings above referred to they would have received from 15 to 20 per cent more per ton mile than the Western Trunk Lines.

6. *The statement that "The fact that average conditions affecting cost of transportation in the two groups have changed and are still growing more favorable to the Southwestern lines tends to justify a reduction of their existing divisions"* (p. 10 of opinion).

If average conditions affecting cost of transportation in the two groups have changed and are still growing more favorable to the Southwestern lines, that fact in so far as it is material to the fixing of divisions, is measured, under the Commission's theory, by the relative amounts required to pay operating expenses, taxes and a fair return on investment. That is the way in which improved conditions affect the expenses and revenue of the railroads. The Commission's formula however, does not yield to the Southwestern carriers even the amount determined on that basis, since the Commission found that the Southwestern lines require 17 to 20 per cent more revenue on the average per unit of service and the formula yields to them only 9 per cent more revenue.

Moreover, we do not consider that the evidence of record shows that conditions in the Southwest have

grown more favorable than conditions in the Western Trunk Line territory.

In our judgment, the facts stated by the Commission simply reflected the growth of the region—a substantial part of which has been sparsely settled and undeveloped, in approaching a more normal condition. The comparison was between such a region and a much better developed region (with the exception of North Dakota and South Dakota, which cut very little figure in the case). There was really no presumption that the divisions originally established ever yielded to the Southwestern carriers a reasonable remuneration, for the reason that the Southwestern carriers have never received a reasonable return upon investment.

The facts with relation to the Southwestern carriers are fairly set forth by Professor Ripley in his report on *Consolidation of Railroads*, 63 I. C. C. 455, 616, where he says:

> Another general feature of the southwest-gulf region is that there are too many railroads to be supported by the available traffic. This is partly due to the well known activities of the railway promoter, who has found in this territory the last and a most inviting field for the practice of his art. There are more railways in fact than the country can probably support for many years ahead. This condition is more true in this region than anywhere else in the United States, and it is a considerable source of embarrassment. One hesitates to recommend the downright abandonment of a railroad line once constructed. Property values have been conditioned upon its operation, and manifest injustice may result from the withdrawal of transportation, but it is nevertheless true that many lines have been laid down for which there was never originally a long-time justification.

The table printed in the Commission's report (R. 84) shows that the condition of the Southwestern carriers from 1916 to 1925 had shown no appreciable improvement, and those were the statistics upon which the Commission based its report and order. The table also shows that there is not enough difference in the relative conditions of the two groups (even if that were a proper measure which we deny) to justify an order transferring revenue from one group to the other, since even a slight error in percentages would produce such a large error in the division of the revenue. The table shows that the condition of the Western Trunk Line group was considerably better than that of the Southwestern group in the year 1916; that conditions were substantially the same in the two groups in the years 1922 and 1923, and only slightly different in the years 1924 and 1925.

7. *The statement that "The average cost of service was apparently given much weight"* (p. 9 of opinion).

The only statistics with reference to cost of service were average costs of service of individual railroads, and groups, arising from all traffic and operations of such railroads and groups of railroads.

As we have already shown, there was no information in the record as to the cost of service of any particular carrier with respect to the joint traffic here in issue, and as we understand the holding of the Court on p. 9 of its opinion, such average cost of service would not be even *prima facie* evidence as to the cost of service with respect to the traffic handled under these joint rates.

VI.

For the reasons above set forth, the Court should either reverse the decree of the District Court or reverse and remand the case in order that the Commission may, in the light of the Court's decision, conduct further proceedings and make complete findings.

We hope that we have been able to convince the Court that the Commission's order should either be set aside in this case or that there should be some further investigation, in order that there may be even a reasonable assurance that a substantially correct result will be reached.

It may be that there should be a reargument, in order that the opposing parties may appear before the court and make a showing, if for example the appellees contend that there was evidence in the record showing cost of operation with respect to the traffic moving under the joint rates in issue here, fair rate of return upon the portion of the property devoted to such service, and other facts segregated to the traffic under these joint rates. We also feel that a reargument for the purpose of having more definitely and authoritatively determined by this Court the fundamental principles which govern in the matter of fixing divisions would be helpful to the railroads and to the Commission in the many matters which are now pending or in prospect before that body.

Upon the present record, however, we earnestly contend that the Commission's order is void because of lack of evidence, and because of disregard of the principles which have been laid down by this Court

with respect to proceedings under Section 15 (6) of the Act.

In the case of *Frank L. Smith, et al.* v. *Illinois Bell Telephone Company,* decided by this court on December 1, 1930, the court, because of a similar lack of evidence as to the value of property devoted to a particular service, remanded the case in order that additional testimony might be taken and necessary additional findings made. It appears to us that in view of the manner in which the instant proceeding was conducted by the Commission—with no clear cut definite issues as to the divisions or types of divisions which were alleged to be unreasonable, and with no showing at the hearings as to what divisions were proposed to be established—a similar order should be made in this case to that which was made in the said case of *Frank L. Smith, et al.* v. *Illinois Bell Telephone Company, supra.*

As we have shown, there was, if we understand the decisions of this Court aright, an entire lack of evidence upon matters which it was essential, under the provisions of Section 15 (6), should be established, in order that the Commission might enter a valid order. In our judgment also, the entire theory of the Commission in this case was, under the circumstances of the carriers involved, in conflict with the principles which this court has laid down in construing the provisions of Section 15 (6).

For the foregoing reasons it is respectfully urged that this petition for rehearing be granted.

Respectfully submitted,

F. H. Moore,

W. E. Davis,

E. T. Miller,

M. G. Roberts,

J. R. Bell,

G. H. Muckley,

H. H. Larimore,

C. S. Burg,

J. R. Turney,

Robert Thompson,
Counsel for Appellants.

Samuel W. Moore,
Of Counsel.

December 16, 1930.

Certificate of Counsel.

I, Frank H. Moore, counsel for the above named appellants, do hereby certify that the foregoing petition for a rehearing of this cause is presented in good faith and not for delay.

Frank H. Moore,
Counsel for Appellants.

APPENDIX A.

Sections of the Interstate Commerce Act which are referred to in petition for rehearing.

Section 15 (6): Whenever, after full hearing upon complaint or upon its own initiative, the Commission is of opinion that the divisions of joint rates, fares, or charges, applicable to the transportation of passengers or property, are or will be unjust, unreasonable, inequitable, or unduly preferential or prejudicial as between the carriers parties thereto (whether agreed upon by such carriers, or any of them, or otherwise established), the Commission shall by order prescribe the just, reasonable, and equitable divisions thereof to be received by the several carriers, and in cases where the joint rate, fare, or charge was established pursuant to a finding or order of the Commission and the divisions thereof are found by it to have been unjust, unreasonable, or inequitable, or unduly preferential or prejudicial, the Commission may also by order determine what (for the period subsequently to the filing of the complaint or petition or the making of the order of investigation) would have been the just, reasonable, and equitable divisions thereof to be received by the several carriers, and require adjustment to be made in accordance therewith.

In so prescribing and determining the divisions of joint rates, fares and charges the Commission shall give due consideration, among other things, to the efficiency with which the carriers concerned are operated, the amount of revenue required to pay their respective operating expenses, taxes, and a fair return on their railway property held for and used in the service of transportation, and the importance to the public of the transportation services of such carriers and also whether any particular participating carrier is an originating, intermediate, or delivering line, and any other fact or circumstance which would ordinarily, without regard to the mileage haul, entitle one carrier to a greater or less proportion than another carrier of the joint rate, fare or charge.

Section 15a (2): In the exercise of its power to prescribe just and reasonable rates the Commission shall initiate, modify, establish or adjust such rates so that carriers as a whole (or as a whole in each of such rate groups or territories as the Commission may from time to time designate) will, under honest, efficient and economical management and reasonable expenditures for maintenance of way, structures and equipment, earn an aggregate annual net railway operating income equal, as nearly as may be, to a fair return upon the aggregate value of the railway property of such carriers held for and used in the

service of transportation: *Provided,* that the Commission shall have reasonable latitude to modify or adjust any particular rate which it may find to be unjust or unreasonable, and to prescribe different rates for different sections of the country.

Section 15a (6): If, under the provisions of this section, any carrier receives for any year a net railway operating income in excess of 6 per centum of the value of the railway property held for and used by it in the service of transportation, one-half of such excess shall be placed in a reserve fund established and maintained by such carrier, and the remaining one-half thereof shall, within the first four months following the close of the period for which such computation is made, be recoverable by and paid to the Commission for the purpose of establishing and maintaining a general railroad contingent fund as hereinafter described. For the purposes of this paragraph the value of the railway property and the net railway operating income of a group of carriers, which the Commission finds are under common control and management and are operated as a single system, shall be computed for the system as a whole irrespective of the separate ownership and accounting returns of the various parts of such system. In the case of any carrier which has accepted the provisions of Section 209 of this amendatory act the provisions of this paragraph shall not be

applicable to the income for any period prior to September 1, 1920. The value of such railway property shall be determined by the Commission in the manner provided in paragraph (4).

(U. S. Code, Title 49, Sections 15 and 15a.)

Sheet

WESTERN T
Exhibit

Chicago and North Western RAILWAY

RECAPITULATION

South Western Traffic **Direction** North bound **Via** Kansas City

Commodity Oil Month of JUNE 1924 Series A Through Waybilling

Terminal Line	Sheet No.	Commodity	Point of Origin: City	Origin: State	Destination: City	Destination: State	No. of Cars	Tonnage (Pounds)	South or West of Missouri River Junction: Revenue as Divided	Car Miles	Rev. Per Car Mile (cents)	Tons One Mile	Rev. Per Ton Mile (mills)	Rev. on Mileage Basis	North or East of Missouri River: Revenue as Divided	Car Miles	Revenue Per Car Mile (cents)	Tons One Mile
Kans.City Southern	1	Gas Oil	Shreveport	La.	Mayfair-Chgo	Ill.	1	39,526	$ 70.24	560	12.54	16,667	4.2	$ 89.80	$105.36	542	19.44	16,132
"	2	Fuel Oil	"	"	"	"	7	431,516	566.47	3920	14.45	120,824	4.7	646.67	706.50	3794	18.62	116,941
"	3	"	"	"	"	"	3	180,590	237.07	1680	14.11	50,565	4.7	270.63	295.67	1626	18.18	48,940
TOTAL CHICAGO (a)							11	671,632	$ 873.78	6160		188,056		$1006.50	$1107.53	5962		182,013
Kans.City Southern (c)	4	Gasoline	"	"	Marshfield	Wis.	1	53,427	$ 89.16	560	15.92	14,960	6.0	$ 105.80	$ 146.59	698	21.29	16,646
Gulf Texas & Western	5	"	Megargel	Tex.	Highwood	Ill.	1	53,778	124.24	594	20.92	15,972	7.8	110.91	96.25	586	16.42	15,756
"	6	"	"	"	Elgin	"	1	53,308	131.14	594	22.08	15,832	8.3	113.43	87.42	550	15.89	14,660
TOTAL ILLINOIS Excl. Chicago (b)							2	107,085	$ 255.38	1188		31,804		$ 224.34	$ 183.67	1136		30,416
Missouri Kans.Tex.of Tex.	7	C S Oil	Dallas	Tex.	Milwaukee	Wis.	1	36,659	121.89	509	23.95	9,329	13.1	77.49	52.24	635	8.23	11,639
Tex.& Ft.Smith	8	Lub Oil	Port Arthur	"	"	"	2	105,831	193.67	1578	12.27	41,750	4.6	238.69	250.62	1358	18.47	35,930
Gulf Texas & Western	9	Gasoline	Megargel	"	"	"	1	53,335	97.61	594	16.43	15,841	6.2	105.73	126.40	664	19.04	17,707
"	10	"	"	"	Green Bay	"	1	53,216	102.11	594	17.19	15,805	6.5	103.30	148.01	843	17.56	22,431
"	11	"	"	"	Kenosha	"	1	53,156	97.26	594	16.36	15,787	6.2	108.28	125.98	631	19.97	16,771
Tex.& Ft.Smith	12	Lub.Oil	Port Arthur	"	"	"	1	54,212	99.21	789	12.57	21,386	4.6	135.70	128.46	535	24.01	14,502
TOTAL WISCONSIN (c)							7	356,409	$ 711.77	4658		119,898		$ 769.19	$ 831.93	4666		118,980
Texas & Pacific (g)	13	Gasoline	Harrys	Tex.	Iron Mtn.	Mich.	1	52,140	$ 95.42	914	10.44	23,627	4.0	$ 156.97	$ 204.71	833	24.58	21,717
Galv.Har.& San.Ant. (e)	14	Lub.Oil	Sinco	Tex.	Lake View	Ia.	1	31,923	$ 65.90	804	8.20	12,833	5.1	$ 92.33	$ 60.24	295	20.42	4,709
Chgo.Rock Island& Gulf	15	Gasoline	No.Ft.Worth	Tex.	Bricelyn	Minn.	1	53,427	$ 104.61	588	17.79	15,708	6.7	125.77	133.14	523	25.46	13,971
Gulf Colo.& Santa Fe	16	"	"	"	Minneota	"	1	53,242	100.14	569	17.60	15,147	6.6	155.52	200.66	531	37.79	14,135
"	17	"	"	"	"	"	1	53,869	101.32	569	17.81	15,325	6.6	157.35	203.04	531	38.24	14,303
"	18	"	"	"	Redwood Falls	"	1	53,783	112.03	569	19.69	15,301	7.3	138.97	154.20	520	29.65	13,983
"	19	"	"	"	Waseca	"	2	107,032	206.57	1138	18.15	30,450	6.8	248.62	269.72	1044	25.83	27,935
TOTAL MINNESOTA (f)							6	321,353	$ 624.67	3433		91,931		$ 826.23	$ 960.76	3149		84,327
Chgo.Rock Isl.& Pac.(a)	20	Fuel Oil	Eldorado	Ark.	Chicago	Ill.	1	59,570	$ 84.35	894	9.43	26,628	3.2	$ 102.27	$ 91.36	643	14.21	19,152
El Dorado & Wesson	21	Road Oil	Eldorado	Ark.	Morrison	Ill.	3	225,864	333.15	2656	12.53	100,058	3.3	435.76	333.15	1404	23.73	52,552
"	22	"	"	"	"	"	4	257,817	380.76	3544	10.74	114,213	3.3	475.74	380.76	2116	18.00	68,192
"	23	"	Pearson	"	Galt	"	2	129,472	190.97	1772	10.78	57,356	3.3	241.01	190.96	1036	18.43	33,533
TOTAL ILLINOIS Excl. Chicago (b)							9	613,153	$ 904.90	7974		271,627		$1153.51	$ 904.91	4556		154,577
El Dorado & Wesson (e)	24	Road Oil	Eldorado	Ark.	Norway	Ia.	1	80,536	$ 121.77	673	18.09	27,100	4.5	$ 154.24	$ 105.73	311	33.35	12,523
Mo.Kans.Tex.of Tex.	25	Gasoline	Burkburnett	Tex.	North Ave.	Ill.	1	53,460	$ 105.74	554	19.09	14,806	7.1	93.03	100.08	675	14.87	17,969
"	26	Fuel Oil	"	"	Mayfair	"	1	78,140	168.31	554	30.38	20,813	8.1	150.63	124.74	524	23.81	19,687
TOTAL CHICAGO (a)							2	188,600	$ 274.05	1108		35,621		$ 243.66	$ 224.82	1197		37,676
Ft.Worth & Denver City	27	Gas	Wichita Falls	Tex.	Belvidere	Ill.	1	78,677	$ 136.47	575	23.73	22,620	6.0	$ 157.10	$ 155.00	491	31.57	19,315
"	28	F.Oil	"	"	Greenwd.Bvd.	"	1	59,777	106.76	575	18.47	17,275	6.2	92.60	99.47	710	14.01	21,220
TOTAL ILLINOIS Excl. Chicago (b)							2	138,454	243.23	1153		39,895		249.70	254.47	1201		40,535
Ft.Worth & Denver City	29	Gasoline	Wichita Falls	Tex.	Beloit	Wis.	1	53,440	90.30	566	15.95	15,123	6.0	110.21	126.65	549	23.07	14,666
"	30	"	"	"	Green Bay	"	1	53,262	89.97	566	15.90	15,073	6.0	112.43	152.86	657	23.27	17,456
"	31	Fuel Oil	"	"	West Allis	"	2	119,613	175.19	1156	15.15	34,568	5.1	203.65	240.42	1202	20.00	35,941
"	32	"	Electra	"	"	"	1	60,635	88.91	548	16.23	16,613	5.4	100.13	121.88	605	20.15	18,348
"	33	"	"	"	Oshkosh	"	1	59,866	79.46	551	14.42	16,493	4.8	96.40	149.51	759	19.70	22,715
"	34	Gasoline	Wichita Falls	"	Two Rivers	"	1	53,500	95.15	575	15.46	15,461	6.2	111.97	148.80	682	21.82	18,241
"	35	"	"	"	Wausau	"	1	53,731	95.60	575	16.63	15,448	6.2	104.14	149.44	778	19.21	20,902
"	36	"	"	"	Racine	"	1	56,640	140.35	566	24.89	16,029	8.8	143.32	134.24	520	25.82	14,728
"	37	"	"	"	Sheboygan	"	1	53,203	132.79	578	22.97	15,376	8.6	122.49	109.76	566	19.39	15,056
"	38	"	"	"	"	"	3	213,679	380.38	1734	21.94	61,810	6.2	499.33	594.85	1947	30.55	69,405
"	39	"	"	"	Two Rivers	"	1	53,381	91.27	578	15.79	15,427	5.9	98.82	138.12	847	17.96	22,606
"	40	"	"	"	New London	"	1	52,833	94.65	575	16.46	15,189	6.2	107.99	146.94	712	20.64	18,809
"	41	"	"	"	Milwaukee	"	2	119,546	211.11	1156	18.26	34,546	6.1	231.85	275.98	1274	21.66	38,076
"	42	"	"	"	"	"	6	346,684	589.43	3450	17.09	99,671	5.9	690.01	821.64	3606	22.79	104,175
"	43	"	"	"	"	"	11	486,535	980.85	6226	15.75	137,689	7.1	1216.66	1400.09	5968	23.46	131,855
"	44	"	"	"	Kenosha	"	1	53,196	89.85	575	15.63	15,293	5.9	108.51	126.07	569	22.16	15,135
"	45	"	"	"	Janesville	"	2	106,766	180.42	1132	15.94	30,221	6.0	233.79	279.79	1098	25.48	29,315
"	46	"	"	"	"	"	1	54,179	97.07	575	16.88	15,576	6.2	114.46	136.53	598	22.83	16,195
Mo.Kans.Tex.of Tex.	47	"	Burkburnett	"	Cuba City	"	1	53,401	123.35	554	22.26	14,792	8.3	104.32	114.28	706	16.14	16,904
"	48	"	"	"	Madison	"	1	53,830	124.34	554	22.44	14,910	8.3	113.06	115.20	620	18.58	16,668
"	49	"	"	"	Racine	"	1	53,348	185.23	554	22.84	14,778	8.3	104.86	100.85	528	16.06	16,755
"	50	"	Wichita Falls	"	Wausau	"	1	53,440	102.54	540	18.99	14,428	7.1	107.00	148.63	728	20.42	19,458
Texas & New Orleans	51	Sub.Oil	Clinton	"	Milwaukee	"	3	146,579	268.23	2406	11.15	58,778	4.6	343.51	347.39	1905	18.23	46,533
TOTAL WISCONSIN (c)							43	2811,509	$4484.94	26893		705,294		5,139.01	6093.90	27520		741,959
Ft.Worth & Denv.City(f)	52	Gasoline	Wichita Falls	Tex.	Kasson	Minn.	1	53,460	95.68	575	16.64	15,370	6.2	122.11	134.72	510	26.41	13,636
Missouri Pacific	53	Road Oil	Smackover	Ark.	Conrad	Ia.	1	80,886	130.39	604	21.59	24,428	5.3	162.24	120.36	329	36.56	13,306
"	54	"	"	"	Grand Mound	"	2	129,144	188.04	1206	15.56	39,001	4.8	227.45	173.57	712	24.38	22,986
"	55	"	"	"	Lisbon	"	1	56,192	81.84	604	13.55	16,970	4.8	103.24	75.54	317	23.83	8,907
"	56	"	"	"	Low Moor	"	1	64,006	93.19	604	15.43	19,330	4.8	95.35	86.03	532	16.17	17,026
"	57	"	"	"	Toledo	"	1	80,192	121.25	604	20.07	24,218	5.0	150.44	103.29	297	34.78	11,904
"	58	"	"	"	"	"	4	256,432	380.75	2416	16.17	78,046	5.0	496.60	332.86	1412	23.57	85,615
TOTAL IOWA (e)							10	668,856	1005.46	6040		201,993		1,195.32	891.65	3599		119,746
S																		

WESTERN TRUNK LINES
Exhibit Ex. A-41

Chicago and North Western RAILWAY

RECAPITULATION

South Western Traffic Direction North bound Via Kansas City

Commodity Oil Month of JUNE 1924 Series A Through Waybilling

Sheet No.	Commodity	Point of Origin: City	Origin: State	Destination: City	Destination: State	No. of Cars	Tonnage (Pounds)	South or West of Missouri River Junction: Revenue as Divided	Car Miles	Rev. Per Car Mile (cents)	Tons One Mile	Rev. Per Ton Mile (mills)	Rev. on Mileage Basis	North or East of Missouri River Junction: Revenue as Divided	Car Miles	Revenue Per Car Mile (cents)	Tons One Mile	Revenue Per Ton Mile (mills)	Revenue on Mileage Basis
1	Gas Oil	Shreveport	La.	Mayfair-Chgo	Ill.	1	59,526	$ 70.24	560	12.54	16,667	4.2	$ 89.80	$105.36	542	19.44	16,132	6.5	$ 86.40
2	Fuel Oil	"	"	"	"	7	431,516	566.47	3920	14.45	120,824	4.7	646.67	706.50	3794	18.62	116,941	6.0	626.30
3	"	"	"	"	"	3	180,590	237.07	1680	14.11	50,565	4.7	270.63	295.67	1626	18.18	46,940	6.0	252.11
						11	671,632	$ 873.78	6160		188,056		$1006.50	$1107.53	5962		182,013		$ 974.61
4	Gasoline	"	"	Marshfield	Wis.	1	53,427	$ 89.16	560	15.92	14,960	6.0	$ 105.80	$ 148.59	698	21.29	18,646	8.0	$ 131.95
5	"	Megargel	Tex.	Highwood	Ill.	1	53,778	124.24	594	20.92	15,972	7.8	110.91	96.25	586	16.42	15,756	6.1	109.58
6	"	"	"	Elgin	"	1	53,308	131.14	594	22.08	15,832	8.3	113.43	87.42	550	15.89	14,660	6.0	105.13
						2	107,085	$ 255.38	1188		31,804		$ 224.34	$ 183.67	1136		30,416		$ 214.71
ex. 7	C S Oil	Dallas	Tex.	Milwaukee	Wis.	1	36,659	121.89	509	23.95	9,389	13.1	77.49	58.24	635	8.23	11,639	4.5	96.64
8	Lub Oil	Port Arthur	"	"	"	2	105,831	193.67	1578	12.27	41,750	4.6	238.69	250.82	1358	18.47	35,930	7.0	205.80
9	Gasoline	Megargel	"	"	"	1	53,335	97.61	594	16.43	15,841	6.2	105.73	126.40	664	19.04	17,707	7.1	118.28
10	"	"	"	Green Bay	"	1	53,816	102.11	594	17.19	15,805	6.5	103.30	148.01	843	17.56	22,431	6.6	146.82
11	"	"	"	Kenosha	"	1	53,196	97.28	594	16.36	15,787	6.2	108.28	125.98	631	19.97	16,771	7.5	114.98
12	Lub.Oil	Port Arthur	"	"	"	1	54,212	99.21	789	12.57	21,386	4.6	135.70	128.48	535	24.01	14,502	8.9	91.59
						7	356,409	$ 711.77	4658		119,898		$ 769.19	$ 831.93	4666		118,980		$ 774.51
13	Gasoline	Harrys	Tex.	Iron Mtn.	Mich.	1	52,140	$ 95.42	914	10.44	23,627	4.0	$ 156.97	$ 204.71	833	24.58	21,717	9.4	$ 145.16
14	Lub.Oil	Sinco	Tex.	Lake View	Ia.	1	31,923	$ 65.90	804	8.20	12,833	5.1	$ 92.33	$ 60.24	295	20.42	4,709	12.8	$ 33.81
15	Gasoline	No.Ft.Worth	Tex.	Bricelyn	Minn.	1	53,427	$ 104.61	588	17.79	15,708	6.7	125.77	133.14	523	25.46	13,971	9.5	111.96
16	"	"	"	Minnesota	"	1	53,242	100.14	569	17.60	15,147	6.6	155.52	200.66	531	37.79	14,135	14.2	145.30
17	"	"	"	"	"	1	53,669	101.32	569	17.81	15,325	6.6	157.35	203.04	531	38.24	14,303	14.2	147.01
18	"	"	"	Redwood Falls	"	1	53,783	112.03	569	19.69	15,301	7.3	136.97	154.20	520	29.65	13,983	11.0	127.26
19	"	"	"	Waseca	"	2	107,032	206.57	1138	18.15	30,450	6.8	246.62	269.78	1014	26.63	27,335	9.7	227.67
						6	321,353	$ 624.67	3433		91,931		$ 686.25	$ 960.76	3149		84,327		$ 759.22
20	Fuel Oil	Eldorado	Ark.	Chicago	Ill.	1	59,570	$ 84.35	894	9.43	26,628	3.2	$ 102.27	$ 91.36	643	14.21	19,152	4.8	$ 73.46
21	Road Oil	Eldorado	Ark.	Morrison	Ill.	3	225,864	333.15	2656	12.53	100,058	3.3	435.76	333.15	1404	23.73	52,552	6.3	230.54
22	"	"	"	"	"	4	257,817	360.76	3544	10.74	114,213	3.3	475.74	380.78	2116	18.00	68,192	5.6	284.82
23	"	Pearson	"	Galt	"	2	189,472	190.97	1772	10.78	57,356	3.3	241.01	190.96	1036	18.43	33,535	5.7	140.94
						9	613,153	$ 904.90	7974		271,627		$1153.51	$ 904.51	4956		154,577		$ 656.30
24	Road Oil	Eldorado	Ark.	Norway	Ia.	1	60,536	$ 121.77	673	18.09	27,100	4.5	$ 154.24	$ 105.73	311	33.35	12,523	8.3	$ 71.26
25	Gasoline	Burkburnett	Tex.	North Ave.	Ill.	1	53,460	$ 105.74	554	19.09	14,806	7.1	93.03	100.06	675	14.87	17,969	5.6	112.79
26	Fuel Oil	"	"	Mayfair	"	1	78,140	168.31	554	30.38	20,813	8.1	150.63	128.76	522	23.61	19,687	6.3	142.42
						2	138,600	$ 274.05	1108		35,621		$ 243.66	$ 228.82	1197		37,676		$ 255.21
27	Gas	Wichita Falls	Tex.	Belvidere	Ill.	1	76,677	$ 136.47	575	23.73	22,620	6.0	$ 157.10	$ 155.00	491	31.57	19,315	8.0	$ 134.37
28	F.Oil	"	"	Greenwd.Bvd.	"	1	59,777	106.76	578	18.47	17,275	6.2	92.60	99.47	710	14.01	21,220	4.7	113.63
						2	136,454	243.23	1153		39,895		249.70	254.47	1201		40,535		248.00
29	Gasoline	Wichita Falls	Tex.	Beloit	Wis.	1	53,440	90.30	566	15.95	15,123	6.0	110.21	126.65	549	23.07	14,669	8.6	106.74
30	"	"	"	Green Bay	"	1	53,262	89.97	566	15.90	15,073	6.0	112.43	152.86	657	23.27	17,496	8.7	130.40
31	Fuel Oil	"	"	West Allis	"	2	119,613	175.19	1156	15.15	34,568	5.1	203.65	240.42	1202	20.00	33,943	6.7	211.96
32	"	Electra	"	"	"	1	60,633	88.91	548	16.23	16,613	5.4	100.13	121.88	605	20.15	18,342	6.6	110.66
33	"	"	"	Oshkosh	"	1	59,866	79.46	551	14.42	16,893	4.8	96.40	149.51	759	19.70	22,719	6.6	132.57
34	Gasoline	Wichita Falls	"	Two Rivers	"	1	53,500	95.15	578	16.46	15,461	6.2	111.97	148.80	682	21.82	18,243	8.2	131.98
35	"	"	"	Wausau	"	1	53,731	95.60	575	16.63	15,448	6.2	104.14	149.44	778	19.21	20,901	7.2	140.90
36	"	"	"	Racine	"	1	56,640	140.35	566	24.89	16,089	8.8	143.32	134.24	520	25.82	14,726	9.1	131.77
37	"	"	"	Sheboygan	"	1	53,203	132.79	578	22.97	15,376	8.6	122.89	109.76	566	19.39	15,056	7.3	130.06
38	"	"	"	"	"	3	213,879	380.36	1734	21.94	61,810	6.2	499.33	504.85	1947	30.55	69,404	8.6	545.30
39	"	"	"	Two Rivers	"	1	53,381	91.27	578	15.79	15,427	5.9	98.82	152.12	847	17.96	22,606	6.7	144.57
40	"	"	"	New London	"	1	52,833	94.65	575	16.46	15,169	6.2	107.99	146.94	712	20.64	18,808	7.8	133.60
41	"	"	"	Milwaukee	"	2	119,946	211.11	1156	18.26	34,546	6.1	231.85	275.98	1274	21.66	38,076	7.2	259.24
42	"	"	"	"	"	6	346,681	589.43	3450	17.09	99,671	5.9	690.01	821.64	3606	22.79	104,175	7.9	721.06
43	"	"	"	"	"	11	486,535	980.65	6226	15.75	137,689	7.1	1216.66	1400.05	5968	23.46	131,851	10.6	1164.28
44	"	"	"	Kenosha	"	1	53,196	89.85	575	15.63	15,293	5.9	108.61	126.07	549	22.15	15,134	8.3	107.51
45	"	"	"	Janesville	"	2	106,788	160.42	1132	15.94	30,221	6.0	233.79	279.79	1098	25.48	29,313	9.5	226.42
46	"	"	"	"	"	1	54,179	97.07	575	16.88	15,576	6.2	114.46	136.53	598	22.83	16,199	8.4	119.14
47	"	Burkburnett	"	Cuba City	"	1	53,401	123.35	594	22.26	14,792	8.3	104.32	114.28	706	16.14	18,904	6.0	133.32
48	"	"	"	Madison	"	1	53,830	124.34	594	22.44	14,910	8.3	113.06	115.80	620	18.58	16,647	6.9	126.48
49	"	"	"	Racine	"	1	53,348	125.23	594	22.24	14,778	8.3	104.86	100.85	628	16.06	16,751	6.0	119.80
50	"	Wichita Falls	"	Wausau	"	1	53,440	102.54	540	18.99	14,428	7.1	107.00	146.63	728	20.42	19,452	7.6	144.17
51	Rub.Oil	Clinton	"	Milwaukee	"	3	146,579	268.23	2406	11.15	58,778	4.6	343.51	347.39	1905	18.23	46,239	7.5	272.11
						43	2811,509	$4044.94	25893		705,294		5,139.01	6693.90	27520		741,598		5989.83
52	Gasoline	Wichita Falls	Tex.	Kasson	Minn.	1	53,460	95.68	575	16.64	15,370	6.2	122.11	134.72	510	26.41	13,632	9.9	106.29
53	Road Oil	Hoackover	Ark.	Conrad	Ia.	1	80,866	130.39	604	21.59	24,428	5.3	162.24	120.36	329	36.56	13,306	9.0	86.51
54	"	"	"	Grand Mound	"	2	129,144	188.04	1208	15.56	39,001	4.8	227.45	173.57	712	24.38	22,988	7.6	134.16
55	"	"	"	Lisbon	"	1	56,192	81.84	604	13.55	16,970	4.8	105.24	75.54	317	23.83	8,907	8.5	54.14
56	"	"	"	Low Moor	"	1	64,006	93.19	604	15.43	19,330	4.8	99.55	86.03	532	16.17	17,026	5.1	83.87
57	"	"	"	Toledo	"	1	80,192	121.85	604	20.07	24,218	5.0	150.44	103.29	297	34.78	11,906	8.7	74.10
58	"	"	"	"	"	4	256,432	380.75	2416	16.17	78,046	5.0	456.60	332.66	1412	23.57	85,615	7.3	267.01
						10	668,896	$1005.46	6040		201,993		1,195.32	891.65	3599		119,748		701.79

Chgo.Rock Island Gulf	15	Gasoline	No.Ft.Worth	Tex.	Brielyn	Minn.	1	55,427	$ 109.51	569	17.79	15,706	6.7	125.77	155.14	585	27.08	14,[illegible]
Gulf Colo.& Santa Fe	16	"	"	"	Minneota	"	1	53,842	100.14	569	17.60	15,147	6.6	155.52	200.64	531	37.79	14,13
"	17	"	"	"	"	"	1	55,869	101.32	569	17.81	15,325	6.6	157.35	203.04	531	38.24	14,3[illegible]
"	18	"	"	"	Redwood Falls	"	1	53,783	112.03	569	19.69	15,301	7.3	138.97	154.20	520	29.65	13,9[illegible]
"	19	"	"	"	Waseca	"	2	107,032	206.57	1138	18.15	30,450	6.8	248.62	269.72	1044	25.83	27,93
TOTAL MINNESOTA (f)							6	321,353	$ 634.67	3433		91,931		$ 826.25	$ 960.76	3149		84,32
Chgo.Rock Isl.& Pac.(a)	20	Fuel Oil	Eldorado	Ark.	Chicago	Ill.	1	59,570	$ 84.35	894	9.43	26,628	3.2	$ 102.27	$ 91.38	643	14.21	19,15
El Dorado & Wesson	21	Road Oil	Eldorado	Ark.	Harrison	Ill.	3	225,864	333.15	2656	12.53	100,056	3.3	435.76	333.15	1404	23.73	52,59
"	22	"	"	"	"	"	4	257,617	360.76	3544	10.74	114,213	3.3	475.74	380.78	2116	18.00	68,15
"	23	"	Pearson	"	Galt	"	2	189,472	190.97	1772	10.78	57,356	3.3	241.01	190.98	1036	18.43	33,53
TOTAL ILLINOIS Excl. Chicago (b)							9	613,153	$ 908.90	7974		271,627		$1153.51	$ 904.91	4556		154,57
El Dorado & Wesson (a)	24	Road Oil	Eldorado	Ark.	Norway	Ia.	1	60,536	$ 121.77	673	18.09	27,100	4.5	$ 154.24	$ 105.73	311	33.35	12,52
Mo.Kans.Tex.of Tex.	25	Gasoline	Burkburnett	Tex.	North Ave.	Ill.	1	53,460	$ 105.74	554	19.09	14,606	7.1	93.03	100.08	675	14.87	17,95
"	26	Fuel Oil	"	"	Mayfair	"	1	78,140	166.31	554	30.56	20,613	8.1	150.63	126.74	528	23.61	19,6[illegible]
TOTAL CHICAGO (a)							2	188,600	$ 274.05	1108		35,621		$ 243.66	$ 226.82	1197		37,67
Ft.Worth & Denver City	27	Gas	Wichita Falls	Tex.	Belvidere	Ill.	1	78,677	$ 136.47	575	23.73	22,628	6.3	$ 157.10	$ 155.00	491	31.57	13,33
"	28	F.Oil	"	"	Greenwd.Bvg.	"	1	59,777	106.76	575	18.47	17,275	6.2	92.60	99.47	710	14.01	21,2[illegible]
TOTAL ILLINOIS Excl. Chicago (b)							2	138,454	243.23	1153		39,895		249.70	254.47	1201		40,5[illegible]
Ft.Worth & Denver City	29	Gasoline	Wichita Falls	Tex.	Beloit	Wis.	1	53,440	90.30	566	15.95	15,123	6.0	110.21	126.65	549	23.07	14,66
"	30	"	"	"	Green Bay	"	1	53,862	89.97	566	15.90	15,073	6.0	118.43	152.86	657	23.27	17,4[illegible]
"	31	Fuel Oil	"	"	West Allis	"	2	119,613	175.19	1156	15.15	34,566	5.1	203.65	260.42	1202	20.00	33,9[illegible]
"	32	"	Electra	"	"	"	1	60,635	88.91	548	16.23	16,613	5.4	100.13	121.88	605	20.15	18,3[illegible]
"	33	"	"	"	Oshkosh	"	1	79,866	79.86	551	14.42	16,493	4.8	96.40	149.51	749	19.70	22,7[illegible]
"	34	Gasoline	Wichita Falls	"	Two Rivers	"	1	53,500	95.15	578	15.36	15,451	6.2	111.97	148.80	682	21.82	18,2[illegible]
"	35	"	"	"	Wausau	"	1	53,731	95.60	575	16.63	15,448	6.2	104.14	149.44	778	19.21	20,9[illegible]
"	36	"	"	"	Racine	"	1	56,640	140.55	566	24.69	16,029	6.8	143.52	134.24	520	25.62	14,7[illegible]
"	37	"	"	"	Sheboygan	"	1	53,203	132.79	576	22.97	15,376	6.6	122.49	109.76	566	19.39	15,0[illegible]
"	38	"	"	"	"	"	3	213,879	380.98	1734	21.94	61,810	6.2	499.33	594.85	1947	30.55	60,4[illegible]
"	39	"	"	"	Two Rivers	"	1	55,381	91.27	578	15.79	15,427	5.9	98.82	152.12	847	17.96	22,6[illegible]
"	40	"	"	"	New London	"	1	52,833	94.65	575	16.46	15,189	6.2	107.99	146.94	712	20.64	16,8[illegible]
"	41	"	"	"	Milwaukee	"	2	119,546	211.11	1156	18.26	34,546	6.1	251.85	275.98	1274	21.66	38,0[illegible]
"	42	"	"	"	"	"	6	346,684	589.43	3450	17.09	99,671	5.9	690.01	821.64	3606	22.79	104,1[illegible]
"	43	"	"	"	"	"	11	486,535	980.65	6226	15.75	137,689	7.1	1216.66	1400.05	5968	23.46	131,6[illegible]
"	44	"	"	"	Kenosha	"	1	55,196	89.85	575	15.65	15,293	5.9	108.61	126.07	509	22.15	15,1[illegible]
"	45	"	"	"	Janesville	"	2	106,786	180.42	1132	15.94	30,221	6.0	233.79	279.79	1098	25.46	29,3[illegible]
"	46	"	"	"	"	"	1	54,179	97.07	575	16.88	15,576	6.2	114.46	136.53	598	22.85	16,1[illegible]
Mo.Kans.Tex.of Tex.	47	"	Burkburnett	"	Cuba City	"	1	53,401	123.35	554	22.26	14,792	8.3	104.32	114.28	708	16.14	16,9[illegible]
"	48	"	"	"	Madison	"	1	53,830	124.34	554	22.44	14,910	8.3	113.06	115.80	620	18.58	16,6[illegible]
"	49	"	"	"	Racine	"	1	55,348	125.23	554	22.594	14,778	8.5	104.86	100.85	628	16.06	16,7[illegible]
"	50	"	Wichita Falls	"	Wausau	"	1	53,440	102.54	540	18.99	14,428	7.1	107.00	146.63	728	20.42	19,4[illegible]
Texas & New Orleans	51	Fuel Oil	Clinton	"	Milwaukee	"	3	146,579	268.23	2406	11.15	58,778	4.6	343.51	347.39	1909	18.23	46,5[illegible]
TOTAL WISCONSIN (c)							43	2811,509	$4444.94	26293		703,294		5,139.01	6095.90	27580		741,9[illegible]
Ft.Worth & Denv.City(f)	52	Gasoline	Wichita Falls	Tex.	Kasson	Minn.	1	53,460	95.68	575	16.64	15,370	6.2	122.11	134.72	510	26.41	13,6[illegible]
Missouri Pacific	53	Road Oil	Smackover	Ark.	Conrad	Ia.	1	80,866	130.39	604	21.59	24,428	5.3	162.24	120.36	329	36.56	13,30
"	54	"	"	"	Grand Mound	"	2	129,144	188.04	1206	15.56	39,001	4.8	227.45	173.57	712	24.38	22,9[illegible]
"	55	"	"	"	Lisbon	"	1	56,192	81.84	604	13.55	16,970	4.8	105.24	75.54	317	23.83	8,50
"	56	"	"	"	Low Moor	"	1	64,006	93.19	604	15.43	19,330	4.8	95.35	86.03	532	16.17	17,02
"	57	"	"	"	Toledo	"	1	80,192	121.25	604	20.07	24,218	5.0	150.44	103.29	297	34.78	11,90
"	58	"	"	"	"	"	4	256,432	380.75	2416	16.17	78,246	5.0	496.69	332.86	1412	23.57	45,8[illegible]
TOTAL IOWA (e)							10	666,856	$1005.46	6040		201,993		1,199.32	891.65	3599		119,7[illegible]
Missouri Pacific (c)	59	Road Oil	Smackover	Ark.	Barneveld	Wis.	1	79,866	$ 123.03	604	20.37	24,126	5.1	164.24	164.54	527	35.02	21,05
GRAND TOTAL							104	5,827,995	$10013.49	63031		1,628,963		$11705.42	$12361.57	56803		1,621,6[illegible]

SUMMARY BY TERMINATING STATES

ILLINOIS (a)	1- 3	11	671,632	$ 873.78	6160	188,056	$ 1,006.50	$ 1,107.53	5962	182,
	20	1	59,570	84.35	894	26,628	102.27	91.38	643	19,
	25-26	2	128,600	274.05	1108	35,621	243.66	226.82	1197	37,
TOTAL CHICAGO,ILL. (a)		14	859,802	1232.18	8162	250,305	1,352.43	1,425.73	7802	238,
ILLINOIS (b)	5- 6	2	107,065	295.36	1186	31,804	224.34	183.67	1136	30,
	21-23	9	613,153	904.90	7974	271,627	1,153.51	904.91	4556	154,
	27-28	2	138,454	243.23	1153	39,895	249.70	254.47	1201	40,
TOTAL ILLINOIS Excl. Chicago (b)		13	858,692	1403.51	10313	343,326	1,627.55	1,343.05	6893	225,
WISCONSIN (c)	4	1	53,427	89.16	560	14,960	105.80	148.59	698	18,
	7-12	7	396,403	711.77	4658	119,898	769.19	831.93	4666	116,
	29-51	43	2,411,509	4444.94	26293	703,294	5,139.01	6,095.90	27580	741,
	59	1	796.88	123.03	604	24,126	164.24	164.54	527	21,
TOTAL WISCONSIN (c)		56	2,901,253	5368.90	32115	862,278	6,178.24	7,298.96	33411	900,
IOWA (e)	14	1	31,923	65.90	804	12,853	92.33	60.84	295	4,
	24	1	80,536	121.77	673	27,100	154.24	103.73	311	12,
	53-56	10	668,856	1005.46	6040	201,993	1,199.32	891.65	3599	119,
TOTAL IOWA (e)		12	781,315	1193.13	7517	241,986	1,441.89	1,055.62	4305	136,
MINNESOTA (f)	15-19	6	321,353	624.67	3433	91,931	826.25	960.76	3149	84,
	52	1	53,460	95.68	575	15,370	122.11	134.72	510	13,
TOTAL IOWA (f)		7	374,813	720.35	4008	107,301	948.36	1,095.48	3659	97,
MICHIGAN (g)	13	1	52,140	95.42	914	25,827	156.97	804.71	833	21,
TOTAL SUMMARY		104	5,827,995	$10013.49	63031	1,628,963	$ 11,705.42	$12,361.57	56803	1,621,

Chgo.Rock Isl.& Pac.(a)	20	Fuel Oil	Eldorado	Ark.	Chicago	Ill.	1	55,910	$ 84.55	894	9.45	28,628	5.2	$ 102.27	$ 91.58	849	
El Dorado & Wesson	21	Road Oil	Eldorado	Ark.	Morrison	Ill.	3	225,864	333.15	2658	12.53	100,058	3.3	435.76	333.15	1404	
"	22	"	"	"	"	"	4	257,617	360.78	3544	10.74	114,213	3.3	475.74	360.78	2116	
"	25	"	Pearson	"	Galt	"	2	189,472	190.97	1772	10.78	57,356	3.3	241.01	190.98	1036	
TOTAL ILLINOIS Excl. Chicago (b)							9	613,153	$ 904.90	7974		271,627		$1153.51	$ 904.91	4556	
El Dorado & Wesson (e)	24	Road Oil	Eldorado	Ark.	Norway	Ia.	1	80,536	$ 121.77	673	18.09	27,100	4.5	$ 154.24	$ 105.73	311	
Mo.Kans.Tex.of Tex.	25	Gasoline	Burkburnett	Tex.	North Ave.	Ill.	1	53,460	$ 105.74	554	19.09	14,808	7.1	93.03	100.08	673	
"	26	Fuel Oil	"	"	Mayfair	"	1	78,140	168.31	554	30.36	20,813	8.1	150.63	128.78	524	
TOTAL CHICAGO (a)							2	131,600	$ 274.05	1108		35,621		$ 243.66	$ 228.82	1197	
Ft.Worth & Denver City	27	Gas	Wichita Falls	Tex.	Belvidere	Ill.	1	76,677	$ 136.47	575	23.73	22,620	6.0	$ 157.10	$ 155.00	491	
"	28	F.Oil	"	"	Greenwd.Pvt.	"	1	59,777	106.76	575	18.47	17,275	6.2	92.60	99.47	710	
TOTAL ILLINOIS Excl. Chicago (b)							2	136,454	243.23	1153		39,895		249.70	254.47	1201	
Ft.Worth & Denver City	29	Gasoline	Wichita Falls	Tex.	Beloit	Wis.	1	53,440	90.30	566	19.95	15,123	6.0	110.21	126.65	549	
"	30	"	"	"	Green Bay	"	1	53,262	89.97	566	19.90	15,073	6.0	112.43	152.86	657	
"	31	Fuel Oil	"	"	West Allis	"	2	119,613	175.19	1156	15.15	34,568	5.1	203.65	240.42	1202	
"	32	"	Electra	"	"	"	1	60,632	88.81	548	16.23	16,613	5.4	100.13	121.88	605	
"	33	"	"	"	Oshkosh	"	1	57,868	79.46	551	14.42	16,493	4.8	96.40	149.51	769	
"	34	Gasoline	Wichita Falls	"	Two Rivers	"	1	53,500	93.15	578	16.46	15,461	6.2	111.97	148.80	682	
"	35	"	"	"	Wausau	"	1	53,731	92.60	575	16.63	15,448	6.2	104.14	149.44	778	
"	36	"	"	"	Racine	"	1	96,640	140.35	566	24.89	16,029	8.8	143.32	134.24	520	
"	37	"	"	"	Sheboygan	"	1	53,803	132.79	578	22.97	15,376	8.6	122.49	109.76	566	
"	38	"	"	"	"	"	3	213,879	380.96	1734	21.94	61,810	6.2	499.33	594.85	1947	
"	39	"	"	"	Two Rivers	"	1	53,581	91.27	578	15.79	15,427	5.9	98.82	152.12	847	
"	40	"	"	"	New London	"	1	52,833	94.65	575	16.46	15,189	6.2	107.99	146.94	712	
"	41	"	"	"	Milwaukee	"	2	119,546	211.11	1156	18.26	34,348	6.1	231.85	275.98	1274	
"	42	"	"	"	"	"	6	346,664	589.43	3450	17.09	99,671	5.9	690.01	821.64	3606	
"	43	"	"	"	"	"	11	486,535	980.85	6226	15.75	137,689	7.1	1216.66	1400.09	5968	
"	44	"	"	"	Kenosha	"	1	53,196	89.85	575	15.85	15,295	5.9	108.61	126.07	589	
"	45	"	"	"	Janesville	"	2	106,786	160.42	1132	15.94	30,221	6.0	233.79	279.79	1096	
"	46	"	"	"	"	"	1	54,179	97.07	575	16.88	15,576	6.2	114.46	136.53	598	
Mo.Kans.Tex.of Tex.	47	"	Burkburnett	"	Cuba City	"	1	53,401	123.35	554	22.26	14,792	8.3	104.32	114.28	708	
"	48	"	"	"	Madison	"	1	53,830	124.34	554	22.44	14,910	8.3	113.06	115.80	680	
"	49	"	"	"	Racine	"	1	53,348	125.25	554	22.84	14,778	8.5	104.86	100.85	628	
"	50	"	Wichita Falls	"	Wausau	"	1	53,440	102.54	540	18.99	14,428	7.1	107.00	146.63	728	
Texas & New Orleans	51	Sub.Oil	Clinton	"	Milwaukee	"	3	146,579	268.83	2406	11.15	58,776	4.6	343.51	347.39	1905	
TOTAL WISCONSIN (c)							43	2411,509	4444.94	26293		703,294		5,139.01	6095.90	27520	
Ft.Worth & Denv.City(f)	52	Gasoline	Wichita Falls	Tex.	Kasson	Minn.	1	53,460	95.68	575	16.64	15,370	6.2	122.11	134.78	510	
Missouri Pacific	53	Road Oil	Smackover	Ark.	Conrad	Ia.	1	80,866	130.39	604	21.59	24,426	5.3	162.24	120.36	329	
"	54	"	"	"	Grand Mound	"	2	129,144	188.04	1208	15.56	39,001	4.8	227.45	173.57	712	
"	55	"	"	"	Lisbon	"	1	56,192	81.84	604	13.55	16,970	4.8	103.24	75.54	317	
"	56	"	"	"	Low Moor	"	1	64,006	93.19	604	15.43	19,330	4.8	95.35	86.03	332	
"	57	"	"	"	Toledo	"	1	60,192	121.85	604	20.07	24,218	5.0	150.44	103.29	297	
"	58	"	"	"	"	"	4	256,432	380.75	2416	16.17	78,046	5.0	456.69	332.86	1412	
TOTAL IOWA (e)							10	668,836	1005.46	6040		201,993		1,195.32	891.65	3599	
Missouri Pacific (e)	59	Road Oil	Smackover	Ark.	Barneveld	Wis.	1	79,866	123.03	604	20.37	24,126	5.1	164.24	164.54	527	
GRAND TOTAL							104	5,827,995	10013.49	63031		1,828,963		$11705.42	12361.57	56803	
SUMMARY BY TERMINATING STATES																	
ILLINOIS (a)	1- 3						11	671,632	$ 873.78	6160		188,056		$ 1,006.50	$ 1,107.53	596	
	20						1	59,570	84.35	894		26,628		102.27	91.58	849	
	25-26						2	128,600	274.05	1108		35,621		243.66	224.82	1197	
TOTAL CHICAGO, ILL. (a)							14	859,802	1232.18	8162		250,305		1,352.43	1,425.73	1803	
ILLINOIS (b)	5- 6						2	107,065	295.36	1188		31,804		224.34	185.67	1134	
	21-23						9	613,153	904.90	7974		271,627		1,153.51	904.91	4556	
	27-28						2	136,454	243.23	1153		39,895		249.70	254.47	1201	
TOTAL ILLINOIS Excl. Chicago (b)							13	856,692	1403.51	10315		343,326		1,627.55	1,345.05	6891	
WISCONSIN (c)	4						1	53,427	89.16	560		14,960		105.80	148.59	696	
	7-12						7	356,403	711.77	4656		119,898		769.19	831.93	4660	
	29-51						48	2,411,509	4444.94	26293		703,294		5,139.01	6,095.90	27528	
	59						1	796.88	123.03	604		24,126		164.24	164.54	527	
TOTAL WISCONSIN (c)							56	2,901,253	5368.90	32113		862,278		6,178.24	7,288.96	33411	
IOWA (e)	14						1	31,925	69.90	804		12,853		92.33	60.84	29	
	24						1	80,536	121.77	673		27,100		154.24	103.73	311	
	53-58						10	668,836	1005.46	6040		201,993		1,195.32	891.65	3599	
TOTAL IOWA (e)							12	781,317	1195.13	7517		241,946		1,441.89	1,055.62	4239	
MINNESOTA (f)	15-19						6	321,353	624.67	3433		91,951		826.23	960.78	3145	
	52						1	53,460	95.68	575		15,370		122.11	134.78	510	
TOTAL IOWA (f)							7	374,813	720.35	4008		107,321		948.34	1,095.56	3655	
MICHIGAN (g)	13						1	52,140	95.42	914		25,827		156.97	804.71	814	
TOTAL SUMMARY							104	5,827,995	10013.49	63031		1,828,963		$ 11,705.42	12,361.57	56803	

RECAPITULATION - VIA KANSAS CITY

To and From	Commodity	Cars	Tons	Ton Miles North	Ton Miles South	Revenue North	Revenue South	Average Haul Per Ton North	Average Haul Per Ton South	P Dolla North
MISSOURI	Lumber	12	348.0	104,120	116,091	995.10	1,462.62	299	334	82.93
	Other Carload Freight	268	3,951.5	1,504,015	641,436	20,397.10	19,892.61	381	162	76.11
	TOTAL	280	4,299.5	1,608,135	757,527	21,392.20	21,355.23	374	176	76.40
ARKANSAS	Lumber	56	1,492.2	892,005	912,219	4,678.02	6,604.37	397	611	83.54
	Other Carload Freight	64	817.7	339,363	330,875	4,503.82	7,554.77	415	405	70.37
	TOTAL	120	2,310.0	931,368	1,243,094	9,181.84	14,159.14	403	538	76.52
LOUISIANA	Lumber	153	3,784.1	1,431,850	2,873,766	11,087.01	17,309.78	378	759	72.46
	Other Carload Freight	102	2,059.4	1,061,922	1,562,941	9,412.03	16,308.71	516	759	92.27
	TOTAL	255	5,843.5	2,493,772	4,436,707	20,499.04	33,618.49	427	759	80.39
OKLAHOMA	Oil (Group A)	637	17,270.2	8,560,396	5,014,258	75,260.85	53,548.31	496	290	118.15
	(Group B)	3,819	90,096.0	43,131,918	30,837,371	379,578.23	300,710.70	479	342	117.92
	Other Carload Freight	654	12,334.3	5,459,937	4,072,966	51,385.00	94,467.40	443	530	78.87
	TOTAL	4,510	119,700.5	57,152,251	39,924,595	506,224.08	448,726.41	477	534	112.25
NORTH-EAST TEXAS	Lumber	42	1,181.7	309,630	631,925	3,452.56	5,838.86	262	535	73.72
	Oil	477	13,158.6	5,676,288	7,527,361	35,019.99	67,110.86	431	572	69.22
	Live Stock	78	875.3	412,693	451,698	3,597.33	7,616.25	471	516	46.12
	Other Carload Freight	507	7,666.1	3,621,587	4,284,185	38,650.67	96,060.34	472	559	76.23
	TOTAL	1,104	22,881.7	10,020,198	12,895,169	78,721.55	176,626.31	438	554	71.30
REMAINDER OF TEXAS COMMON POINT TERRITORY	Lumber	134	3,643.8	1,592,827	2,894,561	10,659.74	16,695.27	437	794	79.55
	Oil	165	4,302.2	2,086,255	3,243,753	12,096.80	23,747.62	485	754	73.31
	Live Stock	29	326.9	187,815	229,321	1,302.67	3,422.70	483	702	44.92
	Other Carload Freight	469	9,141.9	4,077,159	7,631,079	41,083.44	101,039.87	446	838	87.40
	TOTAL	797	17,414.8	7,914,036	13,998,714	65,142.65	144,905.46	454	804	81.78
TEXAS COMMON POINT TERRITORY	Lumber	176	4,825.5	1,902,457	3,526,486	14,113.30	22,534.13	394	731	80.19
	Oil	642	17,460.8	7,762,523	10,771,114	45,116.79	90,858.48	445	617	70.28
	Live Stock	107	1,202.2	570,508	681,019	4,900.00	11,038.95	475	566	45.79
	Other Carload Freight	976	16,808.0	7,698,746	11,915,264	79,734.11	197,100.21	458	709	81.88
	TOTAL	1,901	40,296.5	17,934,234	26,893,883	143,864.20	321,531.77	445	667	78.88
GRAND TOTAL		7,066	172,450.0	80,119,760	73,255,806	701,161.36	839,391.04	465	425	99.23

WESTERN TRUNK LINES
Exhibit Ex. A-60

RECAPITULATION - VIA KANSAS CITY

Miles South	Revenue North	Revenue South	Average Haul Per Ton North	Average Haul Per Ton South	REVENUE Per Car Dollars and Cents North	Per Car Dollars and Cents South	Per Ton Dollars and Cents North	Per Ton Dollars and Cents South	Per Car Mile Cents North	Per Car Mile Cents South	Per Ton Mile Mills North	Per Ton Mile Mills South
116,091	995.10	1,462.62	299	334	82.93	121.89	2.85	4.20	27.73	36.49	9.56	12.60
641,436	20,397.10	19,892.61	381	162	76.11	74.23	5.16	5.03	19.97	45.81	13.56	31.01
757,527	21,392.20	21,355.23	374	176	76.40	76.27	4.98	4.97	20.43	43.38	13.30	28.19
912,219	4,678.02	6,604.87	397	611	83.54	117.94	3.13	4.42	21.04	19.30	7.90	7.24
330,875	4,503.82	7,554.77	415	405	70.37	118.04	5.51	9.24	16.96	29.15	13.27	22.83
1,243,094	9,181.84	14,159.14	403	538	76.52	118.00	3.97	6.13	18.99	21.93	9.86	11.39
2,873,766	11,087.01	17,309.73	378	759	72.46	113.14	2.92	4.57	19.17	14.90	7.74	6.02
1,562,941	9,412.03	16,308.71	516	759	92.27	159.89	4.57	7.91	17.88	21.06	8.86	10.43
4,436,707	20,499.04	33,618.49	427	759	80.39	131.84	3.51	5.76	18.83	17.37	8.22	7.58
5,014,258	75,260.85	53,548.31	496	290	118.15	84.06	4.35	3.10	23.82	28.98	8.79	10.68
30,837,371	379,578.23	300,710.70	479	342	117.92	93.42	4.21	3.33	24.61	27.31	8.80	9.75
4,072,966	51,385.00	94,467.40	443	330	78.57	144.45	4.16	7.65	17.73	43.77	9.41	23.19
39,924,595	506,224.08	448,726.41	477	334	118.25	99.50	4.23	3.75	23.53	29.79	8.86	11.24
631,925	3,453.56	5,838.86	262	535	73.72	139.02	2.92	4.94	28.14	25.99	11.15	9.24
7,527,361	35,019.99	67,110.86	431	572	69.22	140.69	2.51	5.10	16.06	24.60	5.82	8.92
451,698	3,597.33	7,616.25	471	516	46.12	97.65	4.11	8.70	9.79	18.92	8.72	16.86
4,284,185	38,650.67	96,060.34	472	559	76.25	189.47	5.04	12.53	16.15	33.89	10.37	22.42
12,895,169	78,721.55	176,626.31	458	564	71.30	159.99	3.44	7.72	16.28	28.37	7.85	13.70
2,894,561	10,659.74	16,695.27	437	794	79.55	124.59	2.93	4.58	18.20	15.69	6.69	5.77
3,243,753	12,096.80	25,747.62	485	754	73.51	143.93	2.81	5.52	15.12	19.09	5.80	7.32
229,321	1,302.67	3,422.70	483	702	44.92	118.02	3.98	10.47	9.30	16.81	8.25	14.93
7,631,079	41,083.44	101,039.87	446	855	87.60	215.44	4.49	11.05	19.64	25.80	10.08	13.24
13,998,714	65,142.65	144,905.46	454	804	81.75	181.81	3.74	8.32	18.00	22.61	8.25	10.35
3,526,486	14,113.30	22,534.13	394	731	80.19	128.03	2.93	4.67	20.35	17.52	7.42	6.39
10,771,114	48,116.79	90,858.48	445	617	70.28	141.52	2.58	5.20	15.79	22.94	5.81	8.44
681,019	4,900.00	11,038.95	475	566	45.79	103.17	4.08	9.18	9.64	18.23	8.59	16.21
11,916,264	79,734.11	197,100.21	458	709	81.69	201.95	4.74	11.73	17.84	28.48	10.36	16.54
26,893,883	148,864.20	321,531.77	445	667	75.68	169.14	3.57	7.98	17.01	25.56	8.02	11.96
73,255,606	701,161.36	839,391.04	466	425	99.23	118.79	4.07	4.87	21.34	27.95	8.75	11.45

FORM 2 - 300 - 1-26

RESPONDENT ROADS

A.T.& S.F.Ry. :M-K-T RR of Tex.
Ft.W.& D.C.Ry. :Mo.Pac.R.R.Co.
Gulf Coast Lines:P.& S.F.Ry.
G.C.& S.F. Ry. :St.L.-S.F.Ry.
I.-G.N. R.R. :St.L.-S.F.Ry.of Tex.
K.C.M.& O. Ry. :St.L.-S.W.Ry.
KCM&O Ry.of Tex.:St.L.-S.W.Ry.of Tex.
K.C.S. Ry. :Sou.Pac.Lines (La.)
K.O.& G. Ry. :Sou.Pac.Lines (Tex.)
L.R.& N. Co. :T.& Ft.S. Ry.
M-K-T. R.R. :T.& P. Ry.
V.S.& P.Ry.

WESTERN TRUNK LINES VS. SOUTHWESTERN LINES

SUMMARY of Detail Sheet Nos.1 to 5.....by junctions, also commodities, the latter separated showing tota commodity handled, for month of October, 1924, covering movement of freight traffic in carload originati heading in right hand marginal column of this sheet) in Southwestern Lines' Territory (Texas Differential Texas Common Points) and Western Trunk Line Territory and Territory East thereof when moving through W.T. statistical information described in the various headings.

Junctions with W.T.L.Roads	COMMODITY	No. of Carr	CAR MILES		TONS	TONS ONE MILE		REVENUE IN DOLLARS		Aver (
			W.T.L.	S.W.L.		W.T.L.	S.W.L.	W.T.L.	S.W.L.	W.T.L.
E.St.Louis	Apples	1	291	344	13	3.783	4.472	46	93	291.00
"	Apple Waste	2	562	682	45	12.645	15.451	123	332	281.00
"	Asphalt Liquid	17	4.637	8.976	541	147.566	285.648	1.023	2.386	272.77
"	Canned Goods	1	291	343	18	5.238	6.174	66	112	291.00
"	C.S. Meal	5	1.345	2.045	110	29.969	45.141	236	622	272.45
"	C.S. Oil	33	9.483	13.144	988	283.804	392.969	2.066	5.170	287.25
"	Engine & Separator	1	261	358	16	4.176	5.728	74	182	261.00
"	Excelsior Pads	4	1.140	1.528	60	17.018	22.844	187	244	283.63
"	Fuel Wood	4	1.421	1.748	115	40.648	50.080	154	352	353.46
"	Furniture	8	2.111	4.068	68	17.920	34.749	482	759	263.53
"	Hides	3	912	1.306	68	20.612	29.455	212	356	303.12
"	Hogs	1	174	382	12	2.018	4.431	24	49	168.17
"	Lumber	621	151.833	250.845	16.180	4,008.160	6,513.650	34.616	79.117	247.72
"	Machinery	1	330	382	12	3.960	4.458	54	179	330.00
"	Mineral Water	3	861	1.308	50	14.407	21.887	226	221	288.14
"	Misel.C.L.	15	3.970	5.152	254	66.481	87.573	917	1.623	261.74
"	Oil	430	128.880	219.495	14.900	4,470,233	7,611.192	27.604	61.645	300.02
"	Poultry(live)	1	281	416	10	2.810	4.160	80	106	281.00
"	Rice	23	6.321	8.464	518	142.934	190.560	1.832	3.351	275.93
"	Rice Hulls	17	4.859	6.205	338	96.534	123.370	791	1.480	285.60
"	Rubber(Scrap)	2	572	764	58	16.671	22.232	227	256	287.43
"	Scrapers (Track Road)	1	96	528	12	1.152	6.336	54	212	96.00
"	Shells	1	371	295	31	11.501	9.145	133	71	371.00
"	Sorghum	2	220	1.094	48	5.258	26.147	153	377	109.54
"	Tallow	1	281	382	16	4.440	6.036	37	60	277.50

3rd Sheet

I.C.C. DOCKET 15234

Exhibit No. Ex A-116

Sheet No. 1

This Statement Covers

North Bound Traffic

To W.T.L. Territory

State From Arkansas

State To Illinois

WESTERN TRUNK LINES VS. SOUTHWESTERN LINES

5.....by junctions, also commodities, the latter separated showing total number of cars of each October, 1924, covering movement of freight traffic in carload originating and terminating,(see olumn of this sheet) in Southwestern Lines' Territory (Texas Differential Group separate from Trunk Line Territory and Territory East thereof when moving through W.T.L. Territory, showing, d in the various headings.

TONS ONE MILE		REVENUE IN DOLLARS		Average Haul (Miles)		Average Revenue Per Ton Per Mile (Mills)		Average Revenue Per Car Mile (Cents)	
W.T.L.	S.W.L.	W.T.L.	S.W.L.	W.T.L.	S.W.L.	W.T.L.	S.W.L.	W.T.L.	S.W.L.
3.783	4.472	46	93	291.00	344.00	12.16	20.80	15.81	27.03
12.645	15.451	123	332	281.00	343.35	9.73	21.49	21.89	48.68
147.566	285.648	1.023	2.386	272.77	528.00	6.93	8.35	22.06	26.58
5.238	6.174	66	112	291.00	343.00	12.60	18.14	22.68	32.65
29.969	45.141	236	622	272.45	410.37	7.87	13.78	17.55	30.42
283.804	392.969	2.066	5.170	287.25	397.74	7.28	13.16	21.79	39.33
4.176	5.728	74	182	261.00	358.00	17.72	31.77	28.35	50.84
17.018	22.844	187	244	283.63	380.73	10.99	10.68	16.40	15.97
40.648	50.080	154	352	353.46	435.48	3.79	7.03	10.84	20.14
17.920	34.749	482	759	263.53	511.01	26.90	21.84	22.83	18.66
20.612	29.455	212	356	303.12	433.16	10.28	12.09	23.25	27.26
2.018	4.431	24	49	168.17	369.25	11.89	11.06	13.79	12.83
4,008.160	6,513.650	34.616	79.117	247.72	402.57	8.62	12.15	22.76	31.54
3.960	4.458	54	179	330.00	371.50	13.64	40.15	16.36	46.83
14.407	21.887	226	221	288.14	437.74	15.69	10.10	26.25	16.90
66.481	87.573	917	1.623	261.74	344.78	13.79	18.53	23.10	31.50
4,470.233	7,611.192	27.604	61.645	300.02	510.82	6.18	8.10	21.42	28.08
2.810	4.160	80	106	281.00	416.00	28.47	25.48	28.47	25.48
142.934	190.560	1.832	3.351	275.93	367.88	12.82	17.59	28.98	39.59
96.534	123.370	791	1.480	285.60	365.00	8.19	12.00	16.28	23.85
16.671	22.232	227	256	287.43	383.31	13.62	11.51	39.69	33.51
1.152	6.336	54	212	96.00	528.00	46.87	33.46	56.25	40.15
11.501	9.145	133	71	371.00	296.00	11.56	7.76	35.85	24.07
5.258	26.147	153	377	109.54	544.73	29.10	14.42	69.54	34.46
4.440	6.036	37	60	277.50	377.25	7.20	9.94	11.39	15.71

"	Asphalt Liquid	17	4.637	8.976	541	147.566	285.648	1.023	2.386	272.77	
"	Canned Goods	1	291	343	18	5.238	6.174	66	112	291.00	
"	C.S. Meal	5	1.345	2.045	110	29.969	45.141	236	622	272.45	
"	C.S. Oil	33	9.483	13.144	988	283.804	392.969	2.066	5.170	287.25	
"	Engine & Separator	1	261	358	16	4.176	5.728	74	182	261.00	
"	Excelsior Pads	4	1.140	1.528	60	17.018	22.844	187	244	283.63	
"	Fuel Wood	4	1.421	1.748	115	40.648	50.080	154	352	353.46	
"	Furniture	8	2.111	4.068	68	17.920	34.749	482	759	263.53	
"	Hides	3	912	1.306	68	20.612	29.455	212	356	303.12	
"	Hogs	1	174	382	12	2.018	4.431	24	49	168.17	
"	Lumber	621	151.833	250.845	16.180	4,008.160	6,513.650	34.616	79.117	247.72	
"	Machinery	1	330	382	12	3.960	4.458	54	179	330.00	
"	Mineral Water	3	861	1.308	50	14.407	21.887	226	221	288.14	
"	Miscl.C.L.	15	3.970	5.152	254	66.481	87.573	917	1.623	261.74	
"	Oil	430	128.880	219.495	14.900	4,470.233	7,611.192	27.604	61.645	300.02	
"	Poultry(live)	1	281	416	10	2.810	4.160	80	106	281.00	
"	Rice	23	6.321	8.464	518	142.934	190.560	1.832	3.351	275.93	
"	Rice Hulls	17	4.859	6.205	338	96.534	123.370	791	1.480	285.60	
"	Rubber(Scrap)	2	572	764	58	16.671	22.232	227	256	287.43	
"	Scrapers (Track Road)	1	96	528	12	1.152	6.336	54	212	96.00	
"	Shells	1	371	295	31	11.501	9.145	133	71	371.00	
"	Sorghum	2	220	1.094	48	5.258	26.147	153	377	109.54	
"	Tallow	1	281	382	16	4.440	6.036	37	60	277.50	
Total via E.St.Louis		1.198	321.503	530.254	34.481	9,429.938	15,523.888	71.417	159.355	273.48	
Cairo	Lumber	3	376	768	102	13.260	26.528	222	307	130.00	
"	Miscl.C.L.	1	391	280	5	1.838	1.316	57	115	367.60	
Total via Cairo		4	767	1.048	107	15.098	27.844	279	422	141.10	

3.783	4.472	46	93	291.00	344.00	12.16	20.80	15.81	27.03	
12.645	15.451	123	332	281.00	343.35	9.73	21.49	21.89	48.68	
147.566	285.648	1.023	2.386	272.77	528.00	6.93	8.35	22.06	26.58	
5.238	6.174	66	[illegible]	291.00	343.00	12.60	18.14	22.68	32.65	
29.969	45.141	236	[illegible]22	272.45	410.37	7.87	13.78	17.55	30.42	
283.804	392.969	2.066	5.170	287.25	397.74	7.28	13.16	21.79	39.33	
4.176	5.728	74	182	261.00	358.00	17.72	31.77	28.35	50.84	
17.018	22.844	18[illegible]	244	283.63	380.73	10.99	10.68	16.40	15.97	
40.648	50.080	154	352	353.46	435.48	3.79	7.03	10.84	20.14	
17.920	34.749	482	759	263.53	511.01	26.90	21.84	22.83	18.66	
20.612	29.455	212	356	303.12	433.16	10.28	12.09	23.25	27.26	
2.018	4.431	24	49	168.17	369.25	11.89	11.06	13.79	12.83	
4,008.160	6,513.650	34.616	79.117	247.72	402.57	8.62	12.15	22.76	31.54	
3.960	4.458	54	179	330.00	371.50	13.64	40.15	16.36	46.83	
14.407	21.887	226	221	288.14	437.74	15.69	10.10	26.25	16.90	
66.481	87.573	917	1.623	261.74	344.78	13.79	18.53	23.10	31.50	
4,470.233	7,611.192	27.604	61.645	300.02	510.82	6.18	8.10	21.42	28.08	
2.810	4.160	80	106	281.00	416.00	28.47	25.48	28.47	25.48	
142.934	190.560	1.832	3.351	275.93	367.88	12.82	17.59	28.98	39.59	
96.534	123.370	791	1.480	285.60	365.00	8.19	12.00	16.28	23.85	
16.671	22.232	227	256	287.43	383.31	13.62	11.51	39.69	33.51	
1.152	6.336	54	212	96.00	528.00	46.87	33.46	56.25	40.15	
11.501	9.145	133	71	371.00	295.00	11.56	7.76	35.85	24.07	
5.258	26.147	153	377	109.54	544.73	29.10	14.42	69.54	34.46	
4.440	6.036	37	60	277.50	377.25	7.20	9.94	11.39	15.71	
9.429.938	15.523.888	71.417	159.355	273.48	450.22	7.57	10.27	22.21	30.05	
13.260	26.528	222	307	130.00	260.08	16.74	11.57	59.04	39.97	
1.838	1.316	57	115	367.60	263.20	31.01	87.39	14.88	41.07	
15.098	27.844	279	422	141.10	260.22	18.48	15.16	36.38	40.27	

Form 1 600 1-26

RESPONDENT ROADS

A.T.& S.F.Ry.	: M-K-T RR of Tex.
Ft.W.& D.C.Ry.	: Mo.Pac.R.R.Co.
Gulf Coast Lines	: P.& S.F.Ry.
G.C.& S.F.Ry	: St.L.-S.F.Ry.
I.-G.N. R.R.	: St.L.-S.F.Ry.of Tex.
K.C.M.& O.Ry.	: St.L.S.W.Ry.
KCM&O Ry.of Texas	: St.L.S.W.Ry.of Tex.
K.C.S.Ry.	: Sou.Pac.Lines (La.)
K.O.& G.Ry.	: Sou.Pac.Lines (Tex)
L.R.& N. Co.	: T.& Ft.S.Ry.
M-K-T R.R.	: T.& P. Ry.
V.S.& P. Ry.	

WESTERN TRUNK LINES VS. SOUTHWESTERN LINES.

RECAPITULATION covering movement of freight traffic in carload originating and terminating in Southwestern Li (Texas Differential Group separate from Texas Common Point) to and from stations on lines in Western Trunk Li from stations East of Western Trunk Line Territory moving through Western Trunk Line Territory, covering divi information described in the various headings separated according to origin and destination states in W.T.L.- junctions shown, for freight traffic settled in accounts during the month of October, 1924.

DIVISION BASIS Divisions Shown are for W.T.L.	Authority for Divisions (See Note)	JUNCTIONS WITH W. T. L. ROADS	Commodity	No. of Cars	CAR MILES		TONS	TONS ONE MILE		REVENUE IN DOLLARS	
					W.T.L.	S.W.L.		W. T. L.	S. W. L.	W. T. L.	S. W.
18.2¢ cwt.	StLSF.D.B.1658	E.St.Louis	Apples	1	291	344	13	3.783	4.472	46	93
13.8¢ cwt.	D.D.	"	Apple Wastes	2	562	682	45	12.645	15.451	123	332
30%	M.P.P.S. 819	"	Asphalt Liquid	17	4.637	8.976	541	147.566	285.648	1.023	2.386
18¢ cwt.	D.D.	"	Canned Goods	1	291	343	18	5.238	6.174	66	112
10.4¢ cwt.	S.W.L.#44	"	C.S.Meal	3	934	1.189	70	21.708	27.935	146	381
11¢ cwt.	D.D.	"	"	1	238	428	20	4.784	8.603	44	123
25% of L.R. rate 39¢	M.P.D.B.4368A	"	"	1	173	428	20	3.477	8.603	46	118
			Total	5	1.345	2.045	110	29.969	45.141	236	622
10.4¢ cwt.	S.W.L.#44	"	C.S. Oil	33	9.483	13.144	988	283.804	392.969	2.066	5.170
22.5¢ cwt.	I.F.A.# 5	"	Engine & Separator	1	261	358	16	4.176	5.728	74	182
15.6¢ cwt.	M.P.D.B.4368A	"	Excelsior Pads	4	1.140	1.528	60	17.018	22.844	187	244
6.7¢ cwt.	M.P.D.B.4368A	"	Fuel Wood	4	1.421	1.748	115	40.648	50.080	154	352
20.5¢ cwt.	I.F.A. # 5	"	Furniture	2	562	832	16	4.496	6.656	64	215
40¢ cwt.	"	"	"	6	1.549	3.236	52	13.424	28.093	418	544
			Total	8	2.111	4.068	68	17.920	34.749	482	759
20¢	S.W.L.# 10	"	Hides	2							

I.C.C. DOCKET 15234
Exhibit No. EX A-116
Sheet No. 1

This Statement Covers
NORTH Bound Traffic
TO W. T. L. Territory
State From ARKANSAS
State TO ILLINOIS

WESTERN TRUNK LINES VS. SOUTHWESTERN LINES.

---

ight traffic in carload originating and terminating in Southwestern Lines' Territory
Texas Common Point) to and from stations on lines in Western Trunk Line Territory, and to and
e Territory moving through Western Trunk Line Territory, covering divisional and statistical
adings separated according to origin and destination states in W.T.L.-S.W.L.Territory, via
ttled in accounts during the month of October, 1924.

TONS	TONS ONE MILE		REVENUE IN DOLLARS		Average Haul (Miles)		Average Revenue Per Ton Per Mile (Mills)		Average Revenue Per Car Mile (Cents)	
	W. T. L.	S. W. L.	W. T. L.	S. W. L.	W. T. L.	S. W. L.	W. T. L.	S. W. L.	W. T. L.	S. W. L.
13	3.783	4.472	46	93	291.00	344.00	12.16	20.80	15.81	27.03
45	12.645	15.451	123	332	281.00	343.35	9.73	21.49	21.89	48.68
541	147.566	285.648	1.023	2.386	272.77	528.00	6.93	8.35	22.06	26.58
18	5.238	6.174	66	112	291.00	343.00	12.60	18.14	22.68	32.65
70	21.708	27.935	146	381	310.11	399.07	6.73	13.64	15.63	32.04
20	4.784	8.603	44	123	239.20	430.15	9.20	14.30	18.49	28.74
20	3.477	8.603	46	118	173.85	430.15	13.23	13.72	26.59	27.57
110	29.969	45.141	236	622	272.45	410.37	7.87	13.78	17.55	30.42
988	283.804	392.969	2.066	5.170	287.25	397.74	7.28	13.16	21.79	39.33
16	4.176	5.728	74	182	261.00	358.00	17.72	31.77	28.35	50.84
60	17.018	22.844	187	244	283.63	380.73	10.99	10.68	16.40	15.97
115	40.648	50.080	154	352	353.46	435.48	3.79	7.03	10.84	20.14
16	4.496	6.656	64	215	281.00	416.00	14.23	32.30	11.39	25.84
52	13.424	28.093	418	544	258.15	540.25	31.14	19.36	26.99	16.81
68	17.920	34.749	482	759	263.53	511.01	26.90	21.84	22.83	18.66

[illegible] cwt.	D.D.		Waste	2	562	582	45	12.645	15.451	123	338
30%	M.P.P.S. 819	"	Asphalt Liquid	17	4.637	8.976	541	147.566	285.648	1.023	2.386
18¢ cwt.	D.D.	"	Canned Goods	1	291	343	18	5.238	6.174	66	112
10.4¢ cwt.	S.W.L.#44	"	C.S.Meal	3	934	1.189	70	21.708	27.935	146	381
11¢ cwt.	D.D.	"	"	1	238	428	20	4.784	8.603	44	123
29% of L.R. rate 39¢	M.P.D.B.4368A	"	"	1	173	428	20	3.477	8.603	46	118
			Total	5	1.345	2.045	110	29.969	45.141	236	622
10.4¢ cwt.	S.W.L.#44	"	C.S. Oil	33	9.483	13.144	988	283.804	392.969	2.066	5.170
22.5¢ cwt.	I.F.A.# 5	"	Engine & Separator	1	261	358	16	4.176	5.728	74	182
15.6¢ cwt.	M.P.D.B.4368A	"	Excelsior Pads	4	1.140	1.528	60	17.018	22.844	187	244
6.7¢ cwt.	M.P.D.B.4368A	"	Fuel Wood	4	1.421	1.748	115	40.648	50.080	154	352
20.5¢ cwt.	I.F.A. # 5	"	Furniture	2	562	832	16	4.496	6.656	64	215
40¢ cwt.	"	"	"	6	1.549	3.236	52	13.424	28.093	418	544
			Total	8	2.111	4.068	68	17.920	34.749	482	759
20%	S.W.L.# 19	"	Hides, Green	1	340	526	22	7.344	11.362	42	168
16¢ cwt.	I.F.A.# 5	"	"	1	281	382	23	6.575	8.939	75	105
20.5¢ cwt.	"	"	"	1	291	398	23	6.693	9.154	95	83
			Total	3	912	1.306	68	20.612	29.455	212	356
33.4%	D.D.	"	Hogs	1	174	382	12	2.018	4.431	24	49

NOTE: The letters "DD" indicate divisions in dispute.
The letters "ND" indicate no divisions published.

2	682	45	12.645	15.451	123	332	281.00	343.25	9.73	21.49	21.89	48.68
7	8.976	541	147.566	285.648	1.023	2.386	272.77	528.00	6.93	8.35	22.06	26.58
1	343	18	5.238	6.174	66	112	291.00	343.00	12.60	18.14	22.68	32.65
4	1.189	70	21.708	27.935	146	381	310.11	399.07	6.73	13.64	15.63	32.04
8	428	20	4.784	8.603	44	123	239.20	430.15	9.20	14.30	18.49	28.74
8	428	20	3.477	8.603	46	118	173.85	430.15	13.23	13.72	26.59	27.57
5	2.045	110	29.969	45.141	236	622	272.45	410.37	7.87	13.78	17.55	30.42
3	13.144	988	283.804	392.969	2.066	5.170	287.25	397.74	7.28	13.16	21.79	39.33
1	358	16	4.176	5.728	74	182	261.00	358.00	17.72	31.77	28.35	50.84
9	1.528	60	17.018	22.844	187	244	283.63	380.73	10.99	10.68	16.40	15.97
2	1.748	115	40.648	50.080	154	352	353.46	435.48	3.79	7.03	10.84	20.14
2	832	16	4.496	6.656	64	215	281.00	416.00	14.23	32.30	11.39	25.84
9	3.236	52	13.424	28.093	418	544	258.15	540.25	31.14	19.36	26.99	16.81
	4.068	68	17.920	34.749	482	759	263.53	511.01	26.90	21.84	22.83	18.66
	526	22	7.344	11.362	42	168	333.82	516.45	5.72	14.79	12.35	31.94
	382	23	6.575	8.939	75	105	285.87	388.65	11.41	11.75	25.69	27.49
	398	23	6.693	9.154	95	83	291.00	398.00	14.19	9.07	32.65	20.85
	1.306	68	20.612	29.455	212	356	303.12	433.16	10.28	12.09	23.25	27.26
	382	12	2.018	4.431	24	49	168.17	369.25	11.89	11.06	13.79	12.83

FORM 6 - - 1-26

RESPONDENT ROADS

A.T.& S.F.Ry. :M-K-T RR of Tex.
FtlW.& D.C.Ry. :Mo.Pac. R.R. Co.
Gulf Coast Lines:P.& S.F.Ry.
G.C.& S.F.Ry. :St.L.-S.F.Ry.
I.-G.N.R.R. :St.L.-S.F.Ry.of Tex.
K.C.M.& O. Ry. :St.L.S.W.Ry.
KCM&O Ry.of Tex.:St.L.S.W.Ry.of Tex.
K.C.S.Ry. :Sou.Pac.Lines (La.)
K.O.& G.Ry. :Sou.Pac.Lines (Tex).
L.R.& N.Co. :T.& Pt.S.Ry.
M-K-T. R.R. :T.& P. Ry.
V.S.& P. Ry.

WESTERN TRUNK LINES VS. SOUTHWESTERN LINES

SUMMARY showing Grand Total of freight traffic handled by all states in Southwestern Lines' Territory to, from and th Western Trunk Line Territory, covering statistical information described in the various headings for freight traffic in accounts during the month of October, 1924.

STATES FROM	STATES TO	TRAFFIC	No. of Cars	CAR MILES W.T.L.	CAR MILES S.W.L.	TONS	TONS ONE MILE W.T.L.	TONS ONE MILE S.W.L.	REVENUE IN DOLLARS W.T.L.	REVENUE IN DOLLARS S.W.L.	S.W.L. S.L.Conn.
Arkansas	Various	North Bound	2.213	693.554	934.640	65.217	20.786.053	28.207.164	155.142	269.368	
Various	Arkansas	South Bound	759	260.187	249.007	15.855	4.375.443	4.572.044	53.773	97.833	
	Total		2.972	953.741	1.183.647	81.072	25.161.496	32.779.208	208.915	367.201	
Louisiana	Various	North Bound	1.243	432.242	852.760	32.694	11.401.568	22.456.333	79.892	161.565	
Various	Louisiana	South Bound	284	119.550	178.205	5.392	2.155.965	3.318.491	24.815	48.488	
	Total		1.527	551.792	1.030.965	38.086	13.557.533	25.774.824	104.707	210.053	
Missouri	Various	North Bound	1.407	327.554	191.310	40.388	8.275.349	4.943.269	82.491	79.962	
Various	Missouri	South Bound	1.306	236.379	170.905	46.422	6.173.298	5.484.435	58.861	94.071	
	Total		2.713	563.933	362.215	86.810	14.448.647	10.427.704	141.352	174.033	
Oklahoma	Various	North Bound	4.588	1.884.228	1.584.062	124.283	51.384.814	43.022.339	444.820	459.226	
Various	Oklahoma	South Bound	654	288.660	241.998	12.017	5.234.774	4.465.585	57.380	122.526	
	Total		5.242	2.172.888	1.826.060	136.300	56.619.588	47.487.924	502.200	581.752	
Texas (C.P.)	Various	North Bound	4.329	1.809.247	2.922.021	108.989	45.919.646	75.207.211	297.693	620.249	
Various	Texas (C.P.)	South Bound	2.919	1.221.474	2.192.765	46.875	19.367.479	35.407.103	256.709	680.570	
	Total		7.248	3.030.721	5.114.786	155.864	65.287.125	110.614.314	554.402	1.300.819	
Texas Diffnl.	Various	North Bound	671	150.418	481.229	8.225	1.929.327	5.785.892	18.061	76.651	
Various	Texas,Diffnl.	South Bound	412	172.241	321.688	4.853	1.999.507	3.904.211	34.086	102.702	
	Total		1.083	322.659	802.917	13.078	3.928.834	9.690.103	52.147	179.353	
Total	North Bound		14.451	5.297.243	6.966.022	379.796	139.696.757	179.622.208	1.078.099	1.667.021	
"	South Bound		6.334	2.298.491	3.354.568	131.414	39.306.466	57.151.869	485.624	1.146.190	
Total North and	South Bound		20.785	7.595.734	10.320.590	511.210	179.003.223	236.774.077	1.563.723	2.813.211	
Arkansas	Various	Lumber	411	107.779	171.546	10.874	2.849.065	4.530.210	25.569	37.128	14.119

I.C.C. DOCKET 15234

Exhibit No. A-123

This statement Covers

Summary of Exhibits

From A-116 to A-122, incl.

WESTERN TRUNK LINES VS. SOUTHWESTERN LINES

tal of freight traffic handled by all states in Southwestern Lines' Territory to, from and through tory,- covering statistical information described in the various headings for freight traffic settled in accounts during the month of October, 1924.

R MILES		TONS	TONS ONE MILE		REVENUE IN DOLLARS			Average Haul (Miles)		Average Revenue Per Ton Per Mile (Mills)		Average Revenue Per Car Mile (Cents)	
	S.W.L.		W.T.L.	S.W.L.	W.T.L.	S.W.L.	S.W.L. S.L.Conn.	W.T.L.	S.W.L.	W.T.L.	S.W.L.	W.T.L.	S.W.L.
54	934.640	65.217	20.786.053	28.207.164	155.142	269.368		318.72	432.51	7.46	9.55	22.37	28.82
87	249.007	15.855	4.375.443	4.572.044	53.773	97.833		275.97	288.37	12.29	21.40	20.67	39.29
41	1.183.647	81.072	25.161.496	32.779.208	208.915	367.201		310.35	404.32	8.30	11.20	21.91	31.02
32	852.760	32.694	11.401.568	22.456.333	79.892	161.565		348.74	686.86	7.01	7.19	18.48	18.35
60	178.205	5.392	2.155.965	3.318.491	24.815	48.488		399.85	615.44	11.51	14.61	20.76	27.21
92	1.030.965	38.086	13.557.533	25.774.824	104.707	210.053		355.97	676.75	7.72	8.15	18.98	20.37
54	191.310	40.388	8.275.349	4.943.269	82.491	79.962		204.90	122.39	9.97	16.18	25.18	41.80
79	170.905	46.422	6.173.298	5.484.435	58.861	94.071		132.98	118.14	9.53	17.15	24.90	55.04
23	362.215	86.810	14.448.647	10.427.704	141.352	174.033		166.44	120.12	9.78	16.69	25.07	48.05
28	1.584.062	124.283	51.384.814	43.022.339	444.820	459.226		413.45	346.16	8.66	10.67	23.61	28.99
40	241.998	12.017	5.234.774	4.465.585	57.380	122.526		435.61	371.61	10.96	27.44	19.88	50.63
88	1.826.060	136.300	56.619.588	47.487.924	502.200	581.752		415.40	348.41	8.87	12.25	23.11	31.86
97	2.922.021	108.989	45.919.646	75.207.211	297.693	620.249		421.32	690.04	6.48	8.25	16.45	21.23
74	2.192.765	46.875	19.361.479	35.407.103	256.709	680.570		413.17	755.35	13.25	19.22	21.01	31.04
21	5.114.786	155.864	65.287.125	110.614.314	554.402	1.300.819		418.87	709.68	8.49	11.76	18.29	25.43
18	481.229	8.225	1.929.327	5.785.892	18.061	76.651		234.57	703.45	9.36	13.25	12.01	15.92
51	321.688	4.863	1.999.507	3.904.211	34.086	102.702		412.01	804.49	17.05	26.31	19.78	31.91
99	802.917	13.078	3.928.834	9.690.103	52.147	179.353		300.41	740.95	13.27	18.51	16.16	22.33
13	6.966.022	379.796	139.696.757	179.622.208	1.078.099	1.667.021		367.82	472.94	7.72	9.28	20.35	23.93
71	3.354.568	131.414	39.306.466	57.151.869	485.624	1.146.190		299.10	434.90	12.35	20.06	21.13	34.17
64	10.320.590	511.210	179.003.223	236.774.077	1.563.723	2.813.211		350.16	463.16	8.74	11.88	20.59	27.26
19	171.546	10.874	2.849.065	4.530.210	25.569	37.128	14.119	262.01	416.61	8.97	8.20	23.72	21.64
62	212.188	9.084	2.835.315	5.534.038	20.499	33.704	12.802	312.12	609.21	7.23	6.09	19.40	15.88
12	17.912	2.466	845.276	494.101	7.116	5.874	2.473	342.77	200.37	8.42	11.89	23.84	32.79

L.R.& F.Co. :T.& Pt.C.Ry.
M-K-T. R.R. :T.& P. Ry.
V.S.& P. Ry.

STATES		TRAFFIC	No. of Cars	CAR MILES		TONS	TONS ONE MILE		REVENUE IN DOLLARS		
FROM	TO			W.T.L.	S.W.L.		W.T.L.	S.W.L.	W.T.L.	S.W.L.	S.W.L. S.L.Cor
Arkansas	Various	North Bound	2.213	693.554	934.640	65.217	20.786.053	28.207.164	155.142	269.368	
Various	Arkansas	South Bound	759	260.187	249.007	15.855	4.378.443	4.572.044	53.773	97.833	
	Total		2.972	953.741	1.183.647	81.072	25.161.496	32.779.208	208.915	367.201	
Louisiana	Various	North Bound	1.243	432.242	852.760	32.694	11.401.568	22.456.333	79.892	161.565	
Various	Louisiana	South Bound	284	119.550	178.205	5.392	2.155.965	3.328.491	24.815	48.488	
	Total		1.527	551.792	1.030.965	38.086	13.557.533	25.774.824	104.707	210.053	
Missouri	Various	North Bound	1.407	327.554	191.310	40.388	8.275.349	4.943.269	82.491	79.962	
Various	Missouri	South Bound	1.306	236.379	170.905	46.422	6.173.298	5.484.435	58.861	94.071	
	Total		2.713	563.933	362.215	86.810	14.448.647	10.427.704	141.352	174.033	
Oklahoma	Various	North Bound	4.588	1.884.228	1.584.062	124.283	51.384.814	43.022.339	444.820	459.226	
Various	Oklahoma	South Bound	654	288.660	241.998	12.017	5.234.774	4.465.585	57.380	122.526	
	Total		5.242	2.172.888	1.826.060	136.300	56.619.588	47.487.924	502.200	581.752	
Texas (C.P.)	Various	North Bound	4.329	1.809.247	2.922.021	108.989	45.919.646	75.207.211	297.693	620.249	
Various	Texas (C.P.)	South Bound	2.919	1.221.474	2.192.765	46.875	19.367.479	35.407.103	256.709	680.570	
	Total		7.248	3.030.721	5.114.786	155.864	65.287.125	110.614.314	554.402	1.300.819	
Texas Diffnl.	Various	North Bound	671	150.418	481.229	8.225	1.929.327	5.785.892	18.061	76.651	
Various	Texas,Diffnl.	South Bound	412	172.241	321.688	4.853	1.999.507	3.904.211	34.086	102.702	
	Total		1.083	322.659	802.917	13.078	3.928.834	9.690.103	52.147	179.353	
Total	North Bound		14.451	5.297.243	6.966.022	379.796	139.696.757	179.622.208	1.078.099	1.667.021	
"	South Bound		6.334	2.298.491	3.354.568	131.414	39.306.466	57.151.869	485.624	1.146.190	
Total North and	South Bound		20.785	7.595.734	10.320.590	511.210	179.003.223	236.774.077	1.563.723	2.813.211	
Arkansas	Various	Lumber From Short Line Connections.	411	107.779	171.546	10.874	2.849.065	4.530.210	25.569	37.128	14.119
Louisiana	"		350	105.692	212.188	9.084	2.835.315	5.834.038	20.499	33.704	12.802
Missouri	"		90	29.852	17.912	2.466	845.276	494.101	7.116	5.874	2.473
Oklahoma	"		144	57.788	66.075	3.834	1.529.354	1.752.186	9.390	12.079	4.044
Texas	"		184	56.336	142.742	4.729	1.543.298	3.824.105	11.009	19.966	3.443
	Total		1.179	357.447	610.463	30.987	9.602.308	16.134.640	73.583	108.751	36.901
	Grand Total		21.964	7.953.181	10.931.053	542.197	188.605.531	252.908.717	1.637.306	2.921.962	36.901

From A-110 To A-122, 1901

CAR MILES		TONS	TONS ONE MILE		REVENUE IN DOLLARS			Average Haul (Miles)		Average Revenue Per Ton Per Mile (Mills)		Average Revenue Per Car Mile (Cents)	
W.T.L.	S.W.L.		W.T.L.	S.W.L.	W.T.L.	S.W.L.	S.W.L. S.L.Conn.	W.T.L.	S.W.L.	W.T.L.	S.W.L.	W.T.L.	S.W.L.
693.554	934.640	65.217	20.786.053	28.207.164	155.142	269.368		318.72	432.51	7.46	9.55	22.37	28.82
260.187	249.007	15.855	4.375.443	4.572.044	53.773	97.833		275.97	288.37	12.29	21.40	20.67	39.29
953.741	1.183.647	81.072	25.161.496	32.779.208	208.915	367.201		310.35	404.32	8.30	11.20	21.91	31.02
432.242	852.760	32.694	11.401.568	22.456.333	79.892	161.565		348.74	686.86	7.01	7.19	18.48	18.95
119.550	178.205	5.392	2.155.965	3.318.491	24.815	48.488		399.85	615.44	11.51	14.61	20.76	27.21
551.792	1.030.965	38.086	13.557.533	25.774.824	104.707	210.053		355.97	676.75	7.72	8.15	18.98	20.37
327.554	191.310	40.388	8.275.349	4.943.269	82.491	79.962		204.90	122.39	9.97	16.18	25.18	41.80
236.379	170.905	46.422	6.173.298	5.484.435	58.861	94.071		132.98	118.14	9.53	17.15	24.90	55.04
563.933	362.215	86.810	14.448.647	10.427.704	141.352	174.033		166.44	120.12	9.78	16.69	25.07	48.05
1.884.228	1.584.062	124.283	51.384.814	43.022.339	444.820	459.226		413.45	346.16	8.66	10.67	23.61	28.99
288.660	241.998	12.017	5.234.774	4.465.585	57.380	122.526		435.61	371.61	10.96	27.44	19.88	50.63
2.172.888	1.826.060	136.300	56.619.588	47.487.924	502.200	581.752		415.40	348.41	8.87	12.25	23.11	31.86
1.809.247	2.922.021	108.989	45.919.646	75.207.211	297.693	620.249		421.32	690.04	6.48	8.25	16.45	21.23
1.221.474	2.192.765	46.875	19.361.479	35.407.103	256.709	680.570		413.17	755.35	13.25	19.22	21.01	31.04
3.030.721	5.114.786	155.864	65.287.125	110.614.314	554.402	1.300.819		418.87	709.68	8.49	11.76	18.29	25.43
150.418	481.229	8.225	1.929.327	5.785.892	18.061	76.651		234.57	703.45	9.36	13.25	12.01	15.92
172.241	321.688	4.853	1.999.507	3.904.211	34.086	102.702		412.01	804.49	17.05	26.31	19.78	31.91
322.659	802.917	13.078	3.928.834	9.690.103	52.147	179.353		300.41	740.95	13.27	18.51	16.16	22.33
5.297.243	6.966.022	379.796	139.696.757	179.622.208	1.078.099	1.667.021		367.82	472.94	7.72	9.28	20.35	23.93
2.298.491	3.354.568	131.414	39.306.466	57.151.869	485.624	1.146.190		299.10	434.90	12.35	20.06	21.13	34.17
7.596.734	10.320.590	511.210	179.003.223	236.774.077	1.563.723	2.813.211		350.16	463.16	8.74	11.88	20.59	27.26
107.779	171.546	10.874	2.849.065	4.530.210	25.569	37.128	14.119	262.01	416.61	8.97	8.20	23.72	21.64
105.692	212.188	9.084	2.835.315	5.534.038	20.499	33.704	12.802	312.12	609.21	7.23	6.09	19.40	15.88
29.852	17.912	2.466	845.276	494.101	7.116	5.874	2.473	342.77	200.37	8.42	11.89	23.84	32.79
67.788	66.075	3.834	1.529.354	1.752.186	9.390	12.079	4.044	398.89	457.01	6.14	6.89	16.25	18.28
56.336	142.742	4.729	1.543.298	3.824.105	11.009	19.966	3.463	326.35	808.65	7.13	5.22	19.54	13.99
357.447	610.463	30.987	9.602.308	16.134.640	73.583	108.751	36.901	309.88	520.69	7.66	6.74	20.59	17.81
7.953.181	10.931.053	542.197	188.605.831	252.908.717	1.637.306	2.921.962	36.901	347.85	466.45	8.68	11.55	20.59	26.73